BENSON ENVIRONMENTAL SERVICES OF LOUISIANA, INC.

SOLID WASTE STANDARD PERMIT APPLICATION

OPERATIONAL PLAN

Drafted: October 1, 2003

Revised: March 1, 2008

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IRISH ENVIRONMENTAL GROUP

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BENSON ENVIRONMENTAL SERVICE, INC. PER20080001

Preserving and Protecting our Environment

To: Louisiana Department of Environmental Quality
Solid Waste Permits Division

From: Brian Benson
Benson Environmental Services of Louisiana, Inc.
✓ AI# 26944

March 5, 2008

Enclosed you will find four (4) copies of our solid waste permit application as outlined in LAC 33:VII.10511.B.1. You will also find a check in the amount of $1,250.00, as provided in LAC 33:VII.10511.B.2, full remittance of waste tire standard permit application fee.

Sincerely,

Brian Benson

DEQ - OES
2008 MAR 11 PM 1:54

P.O. Box 239 • Sibley, LA 71073 • Office (318) 371-6692 • Fax (318) 377-9100

RECEIPT OF CHECK

Report Date/Time
3/12/2008 1:21:10 PM

AI NUMBER	26944
Company Name	Benson Environmental Inc.
Site Name/Location	Tire Shredding Facility
Phone Number	
Date Received	3/11/2008
Date on Check	3/5/2008
Check Number	25399
Amount Received	$1,250.00

RECEIPT GENERATED BY: Sunshine McManus

COMMENTS SW Permit Application

Media: SOLID WASTE

SOLID WASTE STANDARD PERMIT APPLICATION

PART I

1. Name of the applicant (prospective permit holder): **Benson Environmental Services of Louisiana, Inc. (Federal Tax ID# 72-1330767)**

2. Facility Name: **Benson Environmental Services Tire Shredding Facility**

3. Facility Location/Description: **326 Crichton Road Sibley, Louisiana 71073**

4. Location: Section **10** Township **19** Range **8 West -**

   Parish: **Webster**

   Coordinates: Lat. - Degrees **32** Minutes **33** Seconds **20.35**
   Long. - Degrees **93** Minutes **16** Seconds **45.90**

5. Mailing Address: **PO Box 239 Sibley, Louisiana 71073**

6. Contact: **Brian Benson**

7. Telephone: **318-371-6692**

8. Type and Purpose of Operation: **Type I-A Industrial/Shredder/Compactor/Bailer**

9. Site Status: Owned **X** Leased __ Lease Term___Years
   (Note: If leased, provide copy of lease agreement)

10. Operation Status: Existing **X** Proposed__

11. Total Acres **30** Processing **2** Disposal Acres **0**

12. Environmental Permits
    Stormwater Permit: LAR 05N493

SOLID WASTE STANDARD PERMIT APPLICATION

PART I

13. Zoned: Yes___No _X_Requested___

Zone Classification:_____

(Note: If zoned, include zoning affidavit and/or other documentation stating that the proposed use does not violate existing land-use requirements)

14. Types, Quantities, and Sources of Waste

	Processing		Disposal	
	On-Site	Off-Site	On-Site	Off-Site
Residential	---	---	---	---
Industrial	---	---	---	---
Commercial	---	---	---	---
Other (Tires)	**3,500/day**	---	---	---

15. Service Area: __**Statewide plus 17 counties in Texas**_____

List of Parishes: _____

_____

Statewide: _X_ Unlimited____

16. Proof of Operator's Public Notice – Attach proof of publication of the notice regarding the permit application submittal as required by LAC 33:VII.513.A.

SOLID WASTE STANDARD PERMIT APPLICATION

PART I

17. Certification: I have personally examined and I am familiar with the information submitted in the attached document, and I hereby certify under penalty of law that this information is true, accurate, and complete to the best of my knowledge. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment.

Signature Brian Benson

Date 3-5-08

Type Name and Title: **Brian Benson, General Manager**

(attach proof of the legal authority of the signee to sign for the applicant, if applicable)

18. Any other additional information required by the Administrative Authority.

OPERATIONAL PLAN

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CHAPTER 1

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CHAPTER 1
ENVIRONMENTAL OVERVIEW OF THE FACILITY

1.0 INTRODUCTION

The Benson Environmental Services of Louisiana, Inc. (BES) waste tire shredding facility plays an integral role in the State of Louisiana's Waste Tire Management Program by providing a processing facility that converts waste tires into tire derived fuel (TDF) which is readily marketable in north Louisiana. At the same time, the BES waste tire processing facility does not have any real adverse effects on the environment.

The Waste Tire Program resulted from language included in Act 185 of the 1989 Louisiana Legislature. This Act specifically banned whole tires from landfills and required the DEQ to promulgate regulations to promote recycling and reuse of waste tires.

On January 20, 1992, the Solid Waste Division (SWD) promulgated regulations that imposed a $2.00 fee on the retail sale of motor vehicle tires. These fees are collected and deposited into the Waste Tire Management Fund created by Act 664 of the 1992 Louisiana Legislature. Monies from this fund are paid to parishes for the cleaning up unauthorized tire piles, to permitted processors for the processing and marketing of waste tire material, and to those requesting funding for approved research and development projects.

The current act governing waste tires requires the DEQ to promulgate regulations establishing standards, requirements, and permitting procedures for waste tire transporters, and processors. The Act also requires the Secretary of the DEQ to submit an annual report to the Legislature detailing the progress of the waste tire program for the preceding year.

Since the waste tire abatement program began in 1994, 857 promiscuous or unauthorized waste tire sites containing over 7 million tires have been reported to the Department. Cooperative agreements between the LDEQ, parishes, and permitted waste tire processors and LDEQ to processor contracts have resulted in the remediation of 649 waste tire sites. These waste tire sites contained an estimated 6.8 million waste tires. An additional 199 waste tire sites containing an estimated 132,000 waste tires have been remediated through the parish collection center program. Currently, there are 9 remaining reported waste tire sites. The remediation of one site in West Monroe is now in progress. The site contains approximately 20,000 tires. A request for proposal addressing six other sites containing an estimated 9,500 waste tires is moving through the bid process. In the interim, two more small sites have been reported. The waste tire sites remediated through cooperative agreements with parishes or direct contracts by the LDEQ comprise 76% of the reported waste tire sites. Sites remediated through parish collection centers comprise 23% of the reported waste tire sites.

It is the goal of BES to promote the recycling of waste tires and support the Louisiana Waste Tire Program, while at the same time protect human health and the environment. By selecting to process waste tires using shredding and chipping technology, BES produces a product that is readily marketable and yet environmentally friendly to produce. There are no real adverse effects on the environment since the shredding process does not produce any wastewater discharge or air pollutant discharge. The potential adverse environmental effects that could result from pollutant discharge in storm water from an industrial activity is minimized by implementation and strict adherence to the BES SWPPP. The BES SWPPP utilizes a combination of Source Reduction BMPs, Containment/Diversion BMPs, Used Oil

Recycling, Treatment BMPs, and Activity-Specific" BMPs to control storm water runoff pollution.

1.1 POTENTIAL AND REAL ADVERSE ENVIRONMENTAL EFFECTS OF THE BES FACILITY

There are no real adverse environmental effects associated with the BES used tire recycling facility. The BES recycling process does not produce any solid waste (either hazardous or non-hazardous), nor does the facility discharge any wastewater or air pollutants. What minimal solid waste is produced at the BES facility is classified as non-hazardous and consists mainly of office paper trash and quartered tire pieces that are disposed of at a permitted sanitary landfill.

There are potential environmental effects associated with storm water discharge from the industrial facility, as well as the potential for spills and leaks. Both sources of potential environmental effects are addressed in detail in the BES Storm Water Pollution Plan (SWPPP).

1.2 POLLUTANT SOURCES, MATERIAL HANDLING PRACTICES, AND BMPS

There are six areas where material handling and storage activities occur that are exposed to rain fall events.

1. BES receives on average approximately 3,500 used tires per day. The tire receiving area is a paved area outside the plant building. Incoming trucks deliver the tires to the plant by backing up to the receiving area of the plant building. The tires are unloaded individually by hand. As each tire is unloaded, the tire is visually inspected for foreign materials such as dirt, oil, grease, or other debris. Any tire found to contain any foreign material, which could be a source of pollution, is rejected and not allowed off the truck and onto the plant property. The used tires are stored inside the main plant building while in process for shredding. During a rainfall event, incoming tires would be exposed to storm water momentarily before the tire is brought inside the plant building for in-process storage. Storm water runoff from the tire receiving area is collected by a storm water catch basin in the pavement, where it is then piped to a maintained grassy overland flow area that filters the storm water before it reaches Outfall 001. There is approximately 300 feet of grassy overland flow area prior to Outfall 001, which includes a 100 foot grassy buffer zone that surrounds the plant property.

2. The shredded tire storage area is a paved area located outside the plant building. The shredded tire material is piled to await shipment from the facility. The shredded tire storage pile on average contains approximately 60 tons of shredded tire material. During rainfall events, the shredded tire piles are exposed to storm water. The shredded tire material itself is not known to be a contributor of pollutants. However, it is possible that the shredded tire material could introduce metals, particularly zinc, to the storm water. Storm water pollution is controlled by the following practices:
   - Tire receiving practices do not allow any tires to be received, and hence shredded, which contain foreign debris that could contribute pollutants to the storm water;
   - Grassy swales and storm water ditches are maintained to prevent storm water runoff from entering the shredded tire storage area; and,
   - Storm water runoff from the shredded tire storage area must overland flow across approximately 400 feet of maintained grassy area before reaching Outfall 001.

3. The oversize tire storage area is a 2-3 acre non-paved site located outside the plant building where oversize tires are stored. Oversize tires are tires that are too large to be shredded by the

shredding machine (i.e., large tractor tires, etc.). It is a policy of BES not to accept tires that are too large to be shredded onto the property. However, certain circumstances dictate that some oversize tires will be accepted each year. The tires, once received onto the property, are cut into quarters by a tire shear. The tire quarters are then transported to a permitted sanitary landfill for disposal. BES processes approximately 200 oversized tires per year.

During rainfall events, any oversized tires stored at the facility piles are exposed to storm water. The tire material itself is not known to be a specific contributor of pollutants, however, it is possible that the tire material could introduce metals, particularly zinc, to the storm water. Storm water pollution from the oversized tire area is controlled by the following practices:

- Tire receiving practices do not allow any oversized tires to be received and stored that contain foreign debris that could contribute pollutants to the storm water;
- The tires are sheared into quarters as soon as practically possible once they are placed into the outside storage area. Quartering the tires prevents the tires themselves from holding rain water;
- Grassy swales and storm water ditches are maintained to prevent storm water runoff from entering the oversized tire storage area; and,
- Storm water runoff from the oversized tire storage area must overland flow across approximately 600 feet of maintained grassy area before reaching Outfall 001.

4. The rimmed tire process area is a non-paved site located outside the main plant building and exposed to storm water. Under certain circumstances, tires are received that still contain the wheel rims. These tires must first undergo having the rims removed before they can be brought into the plant building for shredding. The rims are removed by hand in the rimmed tire storage area. The tires are then brought into the building for shredding and the rims are placed in a dumpster for disposal. BES processes approximately 5,000 rimmed tires per year.

   During rainfall events, tires that are still in process in the rimmed tire storage area are exposed to storm water. The tires and rims themselves are not known to be contributors of pollutants. However, it is possible that these materials could introduce metals, particularly zinc, into the storm water. Storm water pollution from the rimmed tire process area is controlled by the following practices:

   - Tire receiving practices do not allow any rimmed tires to be received and stored that contain foreign debris that could contribute pollutants to the storm water;
   - The tires are de-rimmed and brought into the main plant building and shredded as soon as practically possible once they are received on site. This practice minimizes the chance that rimmed tires will come into contact with storm water;
   - Grassy swales and storm water ditches are maintained to prevent storm water runoff from entering the rimmed tire process area; and,
   - Storm water runoff from the rimmed tire process area must overland flow across approximately 600 feet of maintained grassy area before reaching Outfall 001.

5. BES uses approximately 4,000 gallons of diesel fuel each year. This fuel is used for the front-end loaders that load out the shredded tire material, as well as the track hoe that operates the oversize tire shear. The equipment fueling area is

located outside the plant building and contains a 1,000-gallon capacity diesel fuel tank.. The fueling area is not a paved area. An earthen dike surrounding the diesel tank provides containment in the event of a tank spill. Storm water that collects inside the dike area is allowed to evaporate. Storm water runoff from this area must overland flows across approximately 600 feet of maintained grassy area before reaching Outfall 001.

6. A kerosene storage tank is used to store kerosene used for plant heating during the winter months. This area is not a paved area. The kerosene is stored a 250-gallon capacity tank that is surrounded by an earthen dike for spill containment. Storm water that collects inside the dike area is allowed to evaporate. Storm water runoff from this area overland flows across approximately 600 feet of grassy area before reaching Outfall 001.

Existing management practices

- All areas surrounding the plant building and storage areas are heavily planted in grass. Good grass cover is maintained by fertilizing and cutting the grass for hay.
- All fuel storage tanks have dikes constructed in accordance with good engineering practices and the BES SPCC Plan.
- All plant personnel are instructed to regularly pick up trash and maintain other "good housekeeping" practices. Used oils are collected and taken to a recycling facility.
- All tires being received at the facility (i.e., regular tires, oversized tires, and rimmed tires) are individually inspected visually for dirt, oil, grease, and other debris that could contribute pollutants to the storm water.

1.3 ECONOMIC, SOCIAL AND ENVIRONMENTAL IMPACT

Approximately 4.3 million waste tires are generated each year by the citizens of Louisiana. Per Louisiana law (Act 185 of the 1989 Legislature), whole waste tires are banned from landfills. As such, the LDEQ must promote recycling and reuse of waste tires. Currently, LDEQ regulations impose a $2.00 fee on the retail sale of motor vehicle tires. This fee is collected and deposited into the Waste Tire Management Fund. Monies are paid from this fund to: 1) parishes for the cleaning up unauthorized tire piles; 2) permitted processors for the processing and marketing of waste tire material; and, 3) those requesting funding for approved research and development projects.

BES is one of six (6) permitted tire recycling facilities in the State of Louisiana. BES receives and shreds approximately 3,500 waste tires per day, or 1,350,000 waste tires per year. Following shredding, the tire material is marketed as tire derived fuel (TDF), mostly as an alternative fuel source for paper mills, or for civil engineering applications (i.e., soil and slope stabilization, drainage aids, etc.), manufactured products (i.e., artificial reefs, mats, soaker hoses, etc.), or pyrolysis.

BES employs 28 people, and thus adds to the economy through payroll, income taxes, payroll taxes, business taxes, property taxes, etc. With the establishment of the BES waste tire shredding facility, approximately twenty (20) new companies have been created for the purpose of transporting waste tires to the BES facility.

The BES waste tire shredding is located on rural property owned and operated by the Webster Parish sanitary landfill. As such, the facility is located in an area that will not have a negative effect on local property values. There has been no increase to the Parish in the cost of police, fire, and medical protection as result of the BES facility, nor have any schools or roads been impacted by the operation of the BES facility. Paved access roads exist to the facility and are not

effected by the volume and/or weight of trucking traffic required to deliver waste tires to the facility.

As previously demonstrated, there are no real negative environmental impacts associated with the operation of the BES waste tire shredding facility. The facility does not have any wastewater or air pollutant discharge. There is a potential environmental impact associated with the storm water runoff from an industrial facility. However, the possibility of negative environmental impact associated with storm water runoff from an industrial facility is kept to a minimum by following the procedures and practices of the BES SWPPP.

Operation of the BES waste tire shredding facility saves the State of Louisiana millions of dollars each year by eliminating the filling of sanitary landfills with waste tires. Furthermore, there is a positive social and environmental impact associated with the elimination of illegal and unsanitary tire piles. Since 1994, waste tire recycling facilities such as BES have been directly involved in the remediation of over 649 illegal tire sites, containing an estimated 6.8 million waste tires, in the State of Louisiana. The majority of the tire material marketed by BES is used as TDF in paper mills in northern Louisiana reducing the operational costs of these facilities.

In summary, the operation of the BES waste tire shredding facility has resulted in a positive economic impact on Webster Parish and local community through the employment of local personnel and resulting increase in the local tax base. There are no known social or environmental costs or impacts attributed to the operation of the facility. Furthermore, the BES waste tire shredding facility is directly responsible for the proper and environmentally acceptable disposal of over 730,000 waste tires per year in Louisiana. The disposal of shredded tire material through beneficial reuse, such as TDF for paper mills, not only reduces the operational costs of the paper mill but helps eliminate illegal tire piles and the filling of Louisiana's sanitary landfills with waste tires.

1.4 ALTERNATIVE TECHNOLOGIES

There are many end-market uses for waste tires. Some common ones are tire derived fuel (TDF), civil engineering applications, manufactured products, and pyrolysis.

Scrap tires have been used as a supplemental fuel source in Japan, Europe, and the United States since the 1970s. Tire derived fuel or TDF is usually produced by cutting waste tires into small chips and removing the wire from them. These chips are then burned as a supplement to other fuels in cement kilns, lime kilns, paper mills, utility boilers, industrial boilers, iron foundries, and copper smelters. Some kilns can burn whole waste tires which reduces or eliminates the costs of pre-processing. TDF compares favorably to the burning of coal in every aspect except for higher zinc emissions.

Civil engineering projects are markets that consume waste tires. Some applications include using tire chips as a fill to stabilize a hillside or slope that has been settling, as retaining wall backfill, as layered thermal insulation that can help reduce frost around basements, as a drainage aid on highway edges, and leachate liners for septic tanks and landfills. A. T. Knecht, Ph.D of the University of New Orleans has been conducting a study of the environmental effects of using tire chips for a leachate liner for the LDEQ.

Waste tires have been used to make such products as artificial reefs, industrial mats, playground and sports mats, soaker hoses, composting/bedding material, shoes, and playground obstacles/swings. The Scrap Tire Management Council estimated that the products market consumed roughly 15 million tires for 1996.

Pyrolysis technology involves heating waste tires and reducing them to their key components. The results of this process

produce a liquid fuel, a carbon black char, and steel. However, the costs associated with this hazardous waste producing technology have limited its market expansion.

BES has selected to employ and market tire shredding and chipping technology. Chipping and shredding of waste tires is a cost effective method waste tire recycling. The chipping and shredding of waste tires is also an environmentally friendly method waste tire recycling as there is no air pollution or industrial wastewater discharge associated with the chipping or shredding of waste tires.

The BES tire chipping and shredding process begins with the receipt of used tires from a permitted waste tire generator. Currently, there are over 1800 tire dealers and generators that have notified the LDEQ that they are operating. This number includes new tire dealers, used tire dealers, and other generators of waste tires. Other generators of waste tires are those businesses or organizations whom through the course of their normal operations produce an amount of waste tires. This classification includes such entities as salvage yards, fleet lines, and certain governmental agencies. Tires are delivered to BES via LDEQ permitted waste tire transporters. The tires are unloaded by hand at the BES facility, counted, and the count compared to that reported on the waste tire manifest. Each tire is also individually inspected visually for dirt, oil, grease, and other debris. No tires are accepted into the facility that may contain pollutants that could enter the environment via storm water or other pathways. Following unloading, the tires are stored in-process inside the main plant building. These tires are then shredded in a chipping and shredding machine, the wire removed with an automatic separator, and the shredded tire material is piled outside the building to await shipment to the market. Most tires are shredded on the same day that they arrive at the BES facility.

There are a number of paper mills in northern Louisiana that are able use TDF as fuel for boilers, etc. BES has been successful in marketing TDF to these paper mills. Other markets that BES has been able to exploit for chipped or shredded tire material includes civil engineering projects such as soil and slope stabilization, drainage aids, and sanitary landfill covers and liners. BES is committed to the waste tire recycling effort and will continue to explore new markets for chipped and shredded waste tire materials.

In summary, the technology employed by BES is the most environmentally protective technology that produces a readily marketable product for the northern Louisiana / southern Arkansas area. The chipping and shredding technology employed by BES has no real negative environmental effects, produces a product that is marketable as TDF to local paper mills, and helps keep Louisiana clean by aiding in the removal of illicit waste tire piles and by keeping waste tires out of sanitary landfills.

1.5 ALTERNATIVE FACILITY SITES

The BES waste tire shredding facility is located on the property of the Webster Parish sanitary landfill. This property is located in a rural area and has been permitted to serve as a sanitary landfill. As such, the property is not near nor endangers any wetlands, estuaries, endangered species habitat, historical or cultural sites, Indian mounds, antebellum homes, or other tourist attractions or facilities. The property is not located in a floodplain nor is it hurricane vulnerable. Furthermore, the site is not located in an area of prime cropland, residential development, schools, day care centers, hospitals, food storage areas, public buildings, or entertainment facilities.

The site geology, hydrology, topography, soil properties, and climatic conditions have all been studied and the site has been permitted as a sanitary landfill for Webster Parish. This makes the site an excellent location fir the BES waster tire shredding

facility. The BES facility does not have any direct real effects on the environment since there is no wastewater discharge nor discharge of air pollutants from the facility. The BES SWPPP minimizes the potential for pollutants to discharge from the facility via storm water runoff.

In summary, it is unlikely that a better location could be found for the BES tire shredding facility. Located in northern Louisiana, the facility is located near its primary market for TDF (i.e., paper mills). Investigations performed during both the permitting of the Webster Parish sanitary landfill and the development of the BES SWPPP have concluded that the site is not located in either an environmentally or socially sensitive location.

CHAPTER 2

Facility Operations

CHAPTER 2
FACILITY OPERATIONS

2.0 INTRODUCTION

It is the policy and goal of Benson Environmental Services, Inc. that the Waste Tire Processing Facility shall be operated in accordance with the provisions of LAC 33:VII.10525 according to the procedures listed herein.

2.1 DAYS AND HOURS OF OPERATION

The Waste Tire Processing Facility normal operational hours are from 6:00 AM to 6:00 PM Monday through Friday. Occasionally, the facility must work additional days/hours due to the demand of the work load, due to equipment maintenance, etc. If operating hours are changed, the regional office of the LDEQ will be notified.

2.2 FACILITY ACCESS AND SECURITY

The Benson Environmental Services, Inc. Waste Tire Processing Facility shall control all ingress and egress to the facility consistent with the provisions of LAC 33:VII.10525. The BES Waste Tire Facility currently has one gate as the sole means of ingress and egress. The plant building, office building, and entrance gate are all locked during non-operational hours. In addition, security cameras are in place and monitored for plant and yard surveillance.

2.3 BUFFER ZONES

A buffer zone of 100 feet minimum shall be maintained around the property. No waste tires or waste tire material shall be placed inside the buffer zone.

2.4 WASTE TIRE RECEIPT AND ACCEPTANCE

It is the policy and goal of Benson Environmental Services, Inc. that the Waste Tire Processing Facility shall accept waste tires in a manner consistent with the provisions of LAC 33:VII.10525 according to the procedures listed herein.

It is the responsibilities of the following personnel to enact and perform the duties required to accomplish this goal.

The General Manager is responsible for the overall administration and operation of the Waste Tire Processing Facility. This responsibility includes the proper acceptance, unloading, and storage of waste tires as outlined by the procedures herein. All incoming tires received at the facility will be individually unloaded by hand. During the unloading process, each tire is visually inspected for dirt, oil, grease, and other debris that could contribute pollutants to the storm water. If any tire is found to have dirt, oil, grease, or other debris, that tire will be rejected and not allowed into the facility. The General Manager is also responsible for verifying the number of tires in each shipment by actually counting each waste tire. This count is compared to the waste tire manifest upon receipt of the tires.

The Office Manager is responsible for the administration of all office activities, including: the signing of waste tire manifests; submitting completed manifests and a copy of the log to the Louisiana Department of Environmental Quality (LDEQ) no later than the 5th of the month following the month in which the tires are accepted; submitting to the LDEQ a monthly report which includes a certified copy of pounds of tires processed during the month, a certified copy of pounds of tires marketed and/or delivered as a product or raw material for beneficial reuse during the month; and, maintaining copies of all manifests, logs and reports submitted to the LDEQ. The Office Manager is also responsible for providing the completed copies of waste tire manifests to the appropriate waste tire generator within 30 days of the origination date of the manifest.

2.4.1 Receipt of Un-manifested Tires

The Benson Environmental Services, Inc. Waste Tire Processing Facility does not accept un-manifested tires at the facility on a regular basis.

2.5 WASTE TIRE PROCESSING METHOD

BES employs tire shredding and chipping technology to process waste tires. The waste tires are shredded in a chipping and shredding machine, the wire removed with an automatic separator, and the shredded tire material is piled outside the building to await shipment to the market. Most tires are shredded on the same day that they arrive at the BES facility. Chipping and shredding of waste tires is a cost effective method of waste tire recycling. The chipping and shredding of waste tires is also an environmentally friendly method waste tire recycling as there is no air pollution or industrial wastewater discharge associated with the chipping or shredding of waste tires

2.6 PROCESS WATER CONTROL

Water is used to cool the cutting blades of the shredding machine. The slab of the building that contains the shredder has a drain in the center that collects all process water. The process water drains into a containment pit and re-circulated back onto the cutter blades for cooling purposes.

2.7 WASTE TIRE STORAGE

Waste tires that are stored outside the processing building shall be stored in piles, the dimensions of which are not to exceed 10 feet in height, 20 feet in width, and 200 feet in length. The total amount of waste tires and volume of waste tire material shall not exceed 60 times the daily capacity of the processing unit. All outside storage piles of tires must be located in accordance with the BES Storm Water Pollution Prevention Plan.

2.8 WASTE TIRE MATERIAL STORAGE

All processed waste tire materials that are stored outside the processing building shall be stored in piles, the dimensions of which are not to exceed 10 feet in height, 20 feet in width, and 200 feet in length. All outside storage piles of tire material must be located in accordance with the BES Storm Water Pollution Prevention Plan.

2.9 END MARKET USE

There are many end-market uses for waste tires. Some common ones are tire derived fuel, civil engineering applications, manufactured products, and pyrolysis. The waste tire material produced at the BES Waste Tire Shredding Facility is primarily used for tire derived fuel or TDF. Scrap tires have been used as a supplemental fuel source in Japan, Europe, and the United States since the 1970s. The waste tire chips are burned as a supplement to other fuels in cement kilns, lime kilns, paper mills, utility boilers, industrial boilers, iron foundries, and copper smelters. The TDF produced by BES is primarily used as a fuel supplement in the many paper mills located in Northwest Louisiana. TDF compares favorably to the burning of coal in every aspect except for higher zinc emissions.

2.10 STORM WATER CONTROL

The BES Waste Tire Processing Facility maintains a dynamic Storm Water Pollution Prevention (SWPPP) as outlined by the US Environmental Protection Agency. This plan is documented in Chapter 3 of this manual.

2.11 GROUNDS MAINTENANCE AND VECTOR CONTROL

The facility grounds shall be maintained at all times in accordance with the provisions outlined in this manual. Grounds maintenance shall include, but not necessarily limited to, the fertilization of grassy areas (i.e., buffer zones, etc.) as required to ensure good ground cover, keeping all grassy areas mowed at all times, and erosion prevention and other such measures to limit the formation of pot holes and other surface irregularities that may trap and hold water which could be used by breeding insects, etc.

The measures outlined above not only prevent storm water pollution, but also

provide vector control. Further vector control measures at the facility shall include: a) not allowing stored tires to hold water (as outlined in the Storm Water Pollution Prevention Plan) as a means to prevent insect breeding, etc.; b) utilizing a "first-in/first-out" inventory plan for stored tires to reduce the amount of time that any given stored tire pile is at the facility to prevent rodent burrowing for food or harborage; d) daily visual inspections to identify any fly, mosquito or other insect, and rodent or bird problems, and, c) any other measures that may be required on an as needed basis (i.e., such as spraying, etc.) for the control of insects, birds, rodents, etc.

2.12 FIRE PROTECTION

No open burning shall be allowed at the Waste Tire Processing Facility. The facility will maintain on file a written agreement with the local fire department regarding fire protection for the facility. During training sessions, the facility will instruct all employees on fire protection and safety at the facility to ensure personnel safety and minimize the impact on the environment.

CHAPTER 3

Storm Water Pollution Prevention Plan

CHAPTER 3
STORM WATER POLLUTION PREVENTION PLAN

3.0 INTRODUCTION

The BES Storm Water Pollution Prevention Plan (SWPPP) for the Waste Tire Processing Facility is defined by a collection of policies and procedures which follow the USEPA suggested format for Storm Water Pollution Prevention Plans. These policies and procedures are presented in this Chapter in the following order:

- Certification and Contact Information;
- Planning & Organization;
- Assessment;
- BMP Identification;
- Implementation;
- Sector N Compliance; and,
- Evaluation & Monitoring

Benson Environmental Services of Louisiana, Inc.
Storm Water Pollution Prevention Plan

CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signed this day March 5, 2008

Brian Benson
General Manager

Contact Information
Benson Environmental Services of Louisiana, Inc.
326 Crichton Road
P.O. Box 239
Sibley, Louisiana 71073

October 1, 2003

Storm Water Pollution Prevention Plan	
Emergency Contact: **Brian Benson**	Work Phone: **(318) 371-6692**
Title: **General Manager**	Emergency Phone: **(870) 694-2120**
Secondary Contact: **J. A. Benson**	Work Phone: **(318) 371-6692**
Title: **President**	Emergency Phone: **(318) 377-6297**
Type of Manufacturer: **Tire Recycle**	
Operating Schedule: **6:00 a.m. - 6:00 p.m. (longer hours are worked as necessary, in which case the LDEQ is notified)**	
Number of Employees: **28**	
Average Wastewater Discharge: **0**	
LPDES Permit Number: **N/A**	

Benson Environmental Services of Louisiana, Inc.
Storm Water Pollution Prevention Plan

PLANNING & ORGANIZATION

Policy
of
Benson Environmental Services of Louisiana, Inc.
Storm Water Pollution Prevention Plan

Policy. It is the goal of Benson Environmental Services of Louisiana, Inc. to develop, implement and maintain a Storm Water Pollution Prevention Plan (SWPPP) as defined by LAC 33:IX.2341.B.14.a-i and k, for Sector N, SIC Code 5093 as described in Table 1.

Responsibilities. It is the responsibilities of the following personnel to enact and perform the duties required to accomplish this goal.

President of Benson Environmental Services of Louisiana, Inc. has final authority to ensure that the SWPPP is implemented and maintained as required by law.

General Manager is responsible for the overall administration and operation of the Waste Tire Processing Facility. This responsibility includes the proper acceptance, unloading, and storage of waste tires as outlined by the procedures herein. The General Manager is also responsible for good housekeeping, employee training, preventative maintenance program, oversees inspections, and acts as the spill response coordinator.

Office Manager is responsible for the administration of all office activities, including coordinating all stages of the SWPPP development and implementation, has signature authority for all aspects of the SWPPP, maintains all SWPPP records, and ensures that all reports are submitted as required.

This policy originally adopted on October 1, 2003.
This policy re-adopted on this day, March 1, 2008.

General Manager

Office Manager

POLLUTION PREVENTION TEAM
PROCEDURE NO. BES-SWPPP-001
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to identify specific individuals within tire shredding facility of Benson Environmental Services of Louisiana, Inc. as members of a storm water pollution prevention team that are responsible for developing the Storm Water Pollution Prevention Plan and assisting in its implementation, maintenance, and revision. Naming the individuals as set forth in this section makes it clear that part of that's person's job is to prevent storm water pollution. Identifying a specific individual also provides a point of contact for those outside the facility who may need to discuss aspects of the facility's Storm Water Pollution Prevention Plan (i.e., regulatory officials, etc.).

2.0 Scope

The scope of this section includes all personnel who have responsibility for development, implementation, maintenance, and revision of the facility's Storm Water Pollution Prevention Plan.

3.0 Policy

Benson Environmental Services of Louisiana, Inc. will develop, implement, maintain, and revise a Storm water Pollution Prevention Plan per the regulatory requirements of the Louisiana Department of Environmental Quality and the US Environmental Protection Agency. The Storm Water Pollution Plan will be developed in accordance with good engineering practices, as well as the USEPA guidance entitled *Storm Water Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices.*

4.0 Regulatory Requirement

The regulatory requirement for this section is defined by the Multi-Sector General Permit that authorizes discharges of storm water within the state of Louisiana from industrial facilities as defined in LAC 33:IX.2341.B.14.a-i and k, for Sector N, SIC Code 5093 as described in Table 1.

Section 4.1 Storm Water Pollution Prevention Plan Requirements

Except as allowed in Part 1.3.1.3.2 for facilities authorized under the MSGP through coverage under an alternate LPDES permit, and Part 2.1.6 for oil and gas facilities which are required to obtain coverage (due to a later RQ spill) after this permit is finalized, you must prepare a Storm Water Pollution Prevention Plan for your facility before submitting your Notice of Intent for permit coverage.

USEPA General Permit Requirements: Part IV.D.1.

Each plan shall identify a specific individual or individuals within the facility organization as members of a storm water pollution prevention team that are responsible for developing the Storm Water Pollution Prevention Plan and assisting the facility or General Manager in its implementation, maintenance, and revision. The plan shall clearly identify the responsibilities of each team member. The activities and responsibilities of the team shall address all aspects of the facility's Storm Water Pollution Prevention Plan.

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System

MSGP	Multi-Sector General Permit
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Pollution Prevention Team

7.1 President

The BES President shall have the final, overall responsibility for the development, implementation, maintenance, and revision of the elements of the SWPPP.

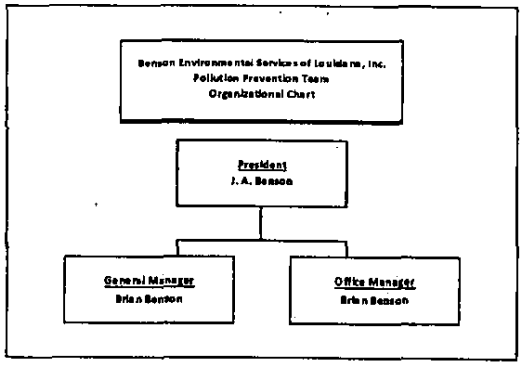
7.2 General Manager

The BES General Manager has complete oversight and responsibility for plant operation and production, equipment maintenance, employee training, and grounds maintenance. The General Manager reports directly to the President. The General Manager's responsibilities include, but are not necessarily limited to: 1) responsible for the preventative maintenance program; 2) "good housekeeping"; 3) employee training; 4) spill response; 5) BMP and grounds maintenance; and, 6) note any changes in production and maintenance methods that would be incorporated in a SWPPP revision.

7.3 Office Manager

The BES Office Manager, reports directly to the BES President, and assists the development, implementation, maintenance, and revision of the SWPPP. The primary SWPPP responsibilities of the Office Manager include, but not necessarily limited to: 1) coordinate and facilitate communications between BES and the regulatory agencies pertaining to the SWPPP; 2) maintain the SWPPP including all records, test analyses, plan revisions, etc.: 3) maintain and ensure all records and reports are submitted as required: 4) conduct compliance evaluations and audits at least once every year to verify that the procedures and practices developed under the SWPPP are adequate and being followed; 5) ensure all follow-up actions resulting from a compliance inspection/evaluation are performed:, 6) signature authority.

8.0 Organization Chart for the BES SWPPP



9.0 Related Procedures

None

BENSON ENVIRONMENTAL SERVICES OF LOUISIANA, INC.
POLLUTION PREVENTION TEAM
USEPA WORKSHEET #1

Leader: Brian Benson **Title:** General Manager

Office Phone: 318-371-6692

Responsibilities:
Signatory authority; coordinate all stages of plan development and implementation. Oversee "good housekeeping", Spill response coordinator; Coordinate employee training program; Choose storm water management options; Note any process changes; Implement preventative maintenance program; Oversee inspections

Members:

(1) Brian Benson **Title:** Office Manager

Office Phone: 318-371-6692

Responsibilities:
Keep all records and ensure that reports are submitted

(2) Lyn B. Irish, Jr., Ph.D. (Irish Environmental, L.L.C.) **Title:** Consultant

Office Phone: 318-868-1380

Responsibilities:
Provide consulting services and oversight

CONSISTENCY WITH OTHER PLANS
PROCEDURE NO. BES-SWPPP-002
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to designate a specific individual within tire shredding facility of Benson Environmental Services of Louisiana, Inc. who will be accountable for spill prevention at the facility.

2.0 Scope

The scope of this section includes all personnel who have responsibility for development, implementation, maintenance, and revision of the facility's Storm Water Pollution Prevention Plan.

4.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will designate a specific individual who will be accountable for spill prevention at the facility.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements, Part IV.D.6.

Part IV.D.6 Consistency with Other Plans

Storm Water Pollution Prevention Plans may reflect requirements for Spill Prevention Control and Countermeasure (SPCC) plans developed for the facility under Section 311 of the Clean Water Act or BMP programs otherwise required by an NPDES permit for the facility as long as such requirement is incorporated into the Storm Water Pollution Prevention Plan.

6.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PPCP	Preparedness, Prevention and Contingency Plan
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
TOMP	Toxic Organic Management Plan
USEPA	United States Environmental Protection Agency

7.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

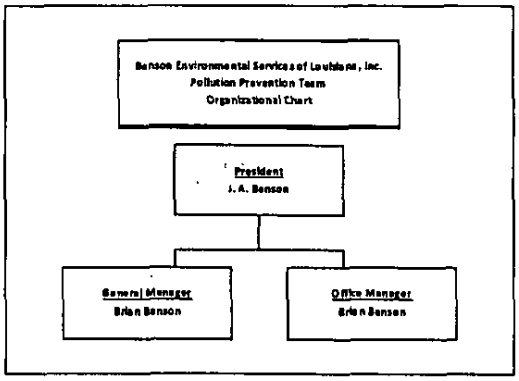
8.0 Spill Prevention, Control and Countermeasure Coordinator

8.1 Brian Benson, General Manager

The BES General Manager is designated as the person accountable for spill prevention at the facility. As such, he is responsible for setting up necessary spill emergency procedures and reporting requirements to isolate, contain, and clean up spills and emergency releases of Section 313 water priority chemicals before a discharge can occur. It is the responsibility of the General Manager to evaluate the following plans to determine which, if any, provisions may be incorporated into the Storm Water Pollution Prevention Plan:

- National Pollutant Discharge Elimination System
- Occupational Safety and Health Administration Emergency Action Plan
- Preparedness, Prevention and Contingency Plan
- Spill Prevention, Control, and Countermeasure Plan
- Storm Water Pollution Prevention Plan
- Toxic Organic Management Plan

9.0 Organization Chart for the BES SWPPP



10.0 Related Procedures

None

Benson Environmental Services of Louisiana, Inc.
Storm Water Pollution Prevention Plan

ASSESSMENT

POLLUTANT SOURCE ASSESSMENT
PROCEDURE NO. BES-SWPPP-003
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to ensure that the pollution prevention team performs an accurate and complete assessment of all potential sources of storm water pollution at the tire shredding facility of Benson Environmental Services of Louisiana, Inc.

2.0 Scope

The scope of this section includes all personnel, materials, and practices at the tire shredding facility of Benson Environmental Services of Louisiana, Inc.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will conduct a complete and accurate assessment of all potential sources of storm water pollution for the tire shredding facility.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.2.	Description of Potential Pollutant Sources
Part IV.D.2.a.(1).	Site Drainage and Potential Pollutant Sources
Part IV,D.2.a.(2).	Types of Pollutants and Flow Direction
Part IV.D.2.b.	Inventory of Exposed Materials
Part IV.D.2.c.	Spills and Leaks
Part IV.D.3.g.(1)	Non-Storm Water Discharges
Part IV.D.3.g.(2)	Non-Storm Water Discharges
Part IV.D.2.d.	Sampling Data
Part IV.D.2.e.	Risk Evaluation and Summary of Potential Pollutant Sources

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Pollutant Source Assessment

7.1 Pollution Prevention team

The BES Pollution Prevention Team is responsible for assessing the tire shredding facility and site and determining what materials or practices are or may be asource of contaminants to the storm water running off of the site. Specifically, the Pollution Prevention Team shall complete the following:

- Assess the potential sources of storm water pollution at the facility;
- Create a map of the facility site to locate pollutant sources and determine storm water management opportunities;
- Conduct a material inventory;
- Evaluate past spills and leaks;
- Identify non-storm water discharges and illicit connections;
- Collect or evaluate storm water quality data; and,
- Summarize the findings of this assessment.

8.0 Related Procedures

None

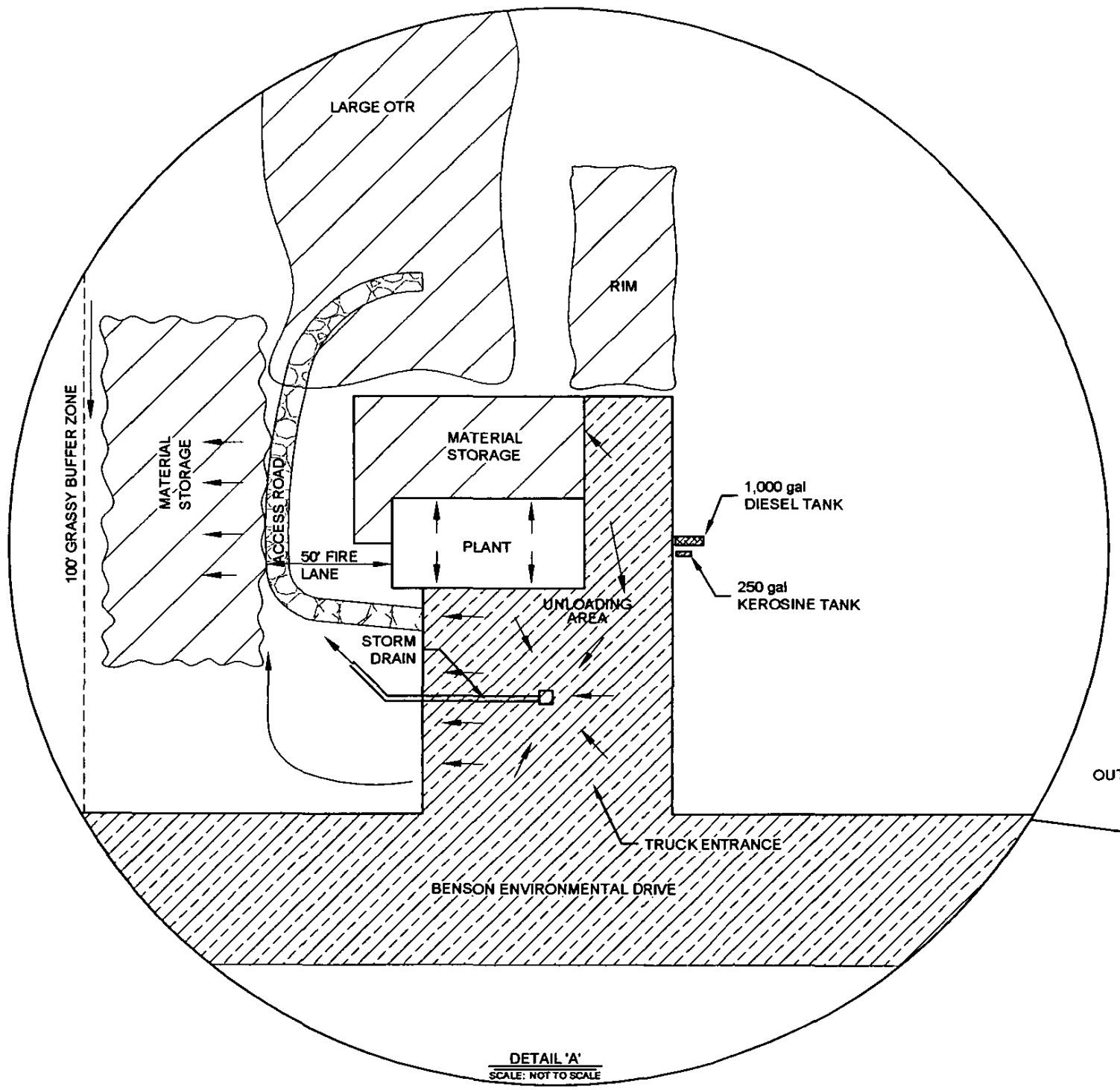
DEVELOPING A SITE MAP **WORKSHEET #2**

Completed By: Lyn Irish - Irish Environmental, L.L.C.
Title: Consultant
Date: March 1, 2008

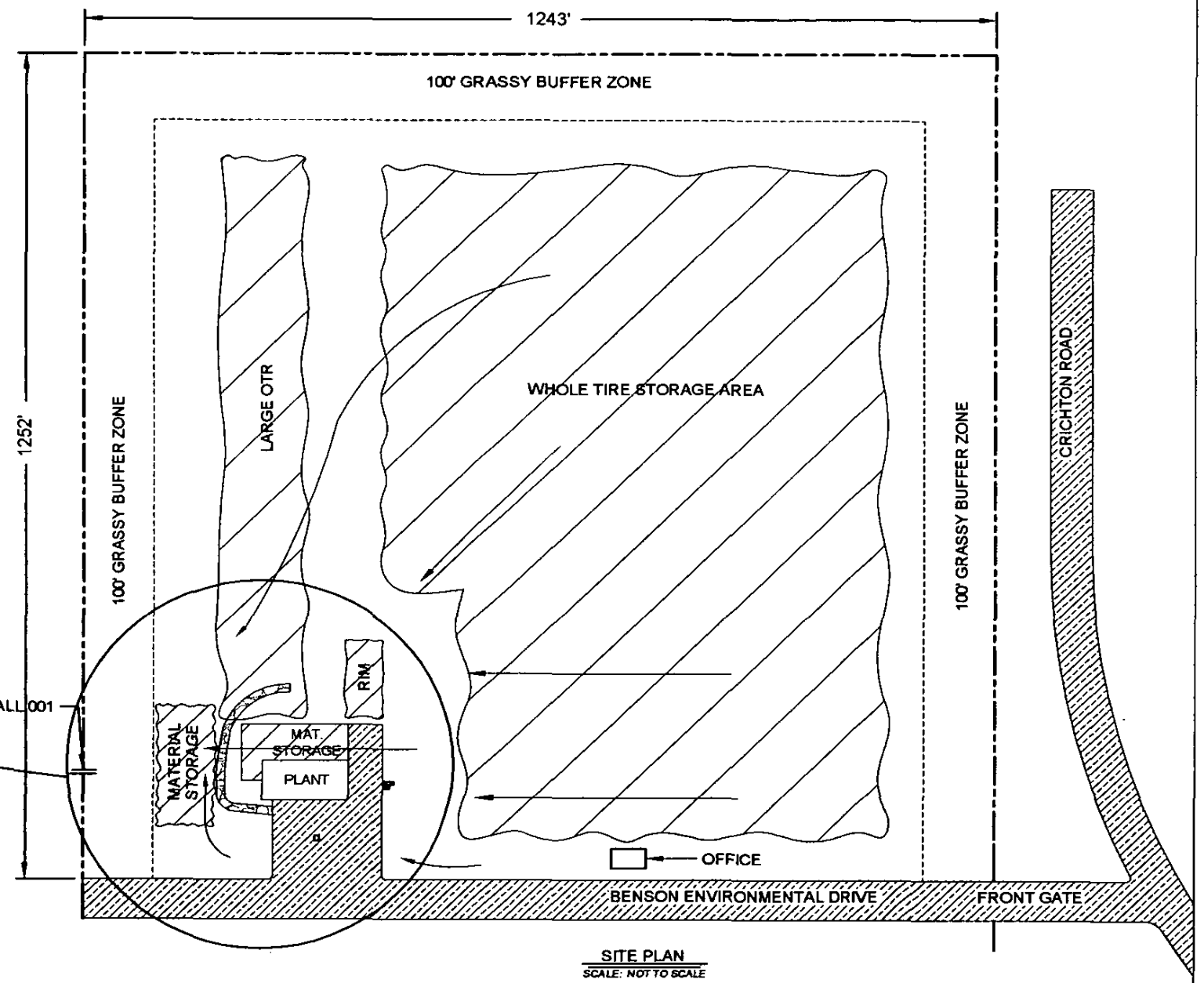
Instructions: Draw a map of your site including a footprint of all buildings, structures, paved areas, and parking lots. The information below describes additional elements required by the EPA's General Permit (see example maps in Figures 2.3 and 2.4).

EPA's General Permit requires that you indicate the following features on your site map:

- All outfalls and water drainages
- Drainage areas of each storm water outfall
- Structural storm water pollution control measures
  - Flow diversion measures
  - Retention/detention ponds
  - Vegetative swells
  - Sediment traps
- Name of receiving waters (or if through a Municipal Separate Storm Sewer System)
- Locations of exposed significant materials (see Section 2.2.2)
- Locations of past spills and leaks
- Location of high risk, waste-generating areas and activities common on industrial sites such as:
  - Fueling stations
  - Vehicle/equipment washing and maintenance areas
  - Area for unloading/loading materials
  - Above-ground tanks for liquid storage
  - Industrial waste management areas (landfills, waste piles, treatment plants, disposal areas)
  - Outside storage areas for raw materials, by-products, and finished products
  - Outside manufacturing areas
  - Other areas of concern (specify:_____)



DETAIL 'A'
SCALE: NOT TO SCALE



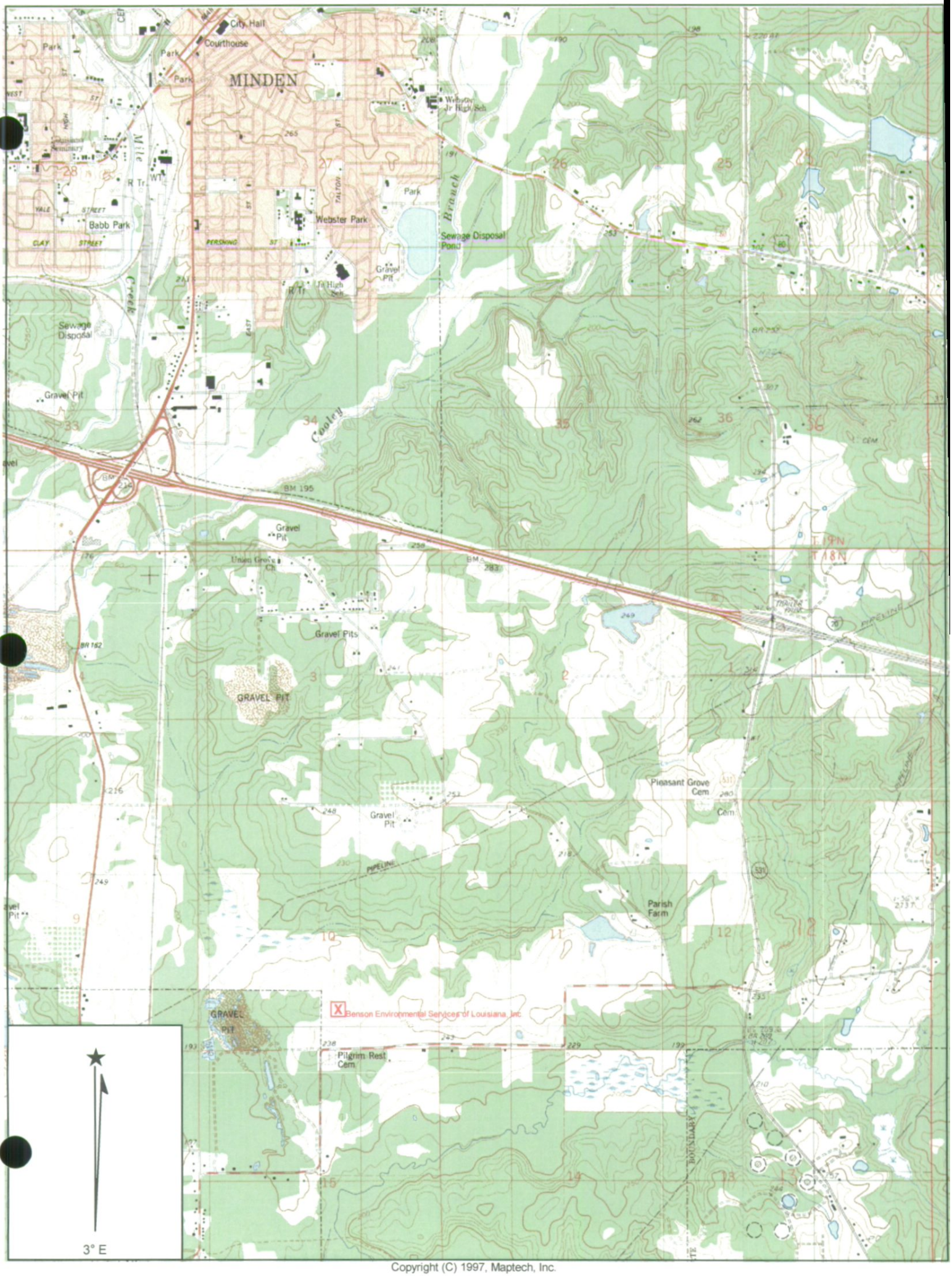
SITE PLAN
SCALE: NOT TO SCALE

LEGEND

STORM WATER FLOW →

PAVED AREA

SITE PLAN	DATE: FEB 08
BENSON ENVIRONMENTAL SERVICES SIBLEY, LOUISIANA	DRAWN BY: PNB CHECKED BY: LBI
IRISH ENVIRONMENTAL GROUP, L.L.C. ENVIRONMENTAL ENGINEERS, PLANNERS AND MANAGERS SHREVEPORT, LOUISIANA	SHEET NO: 1 OF 1



MATERIAL INVENTORY

WORKSHEET #3
Completed by: Brian Benson
Title: General Manager
Date: March 1, 2008

Instructions: List all materials used, stored, or produced onsite. Assess and evaluate these materials for their potential to contribute pollutants to storm water runoff. Also, complete Worksheet #3A if the material has been exposed during the last three years.

Material	Purpose/Location	Used	Produced	Stored	Quantity exposed in last 3 years	Likelihood of contact with storm water. If yes, describe reason	Yes	No
Used Tires	Stored inside building	3,500/d	---	---	No	Outside truck unloading area		√
Shredded Tires	Stored outside	---	---	60 t/d	Yes	Shredded tires are stored outside		√
Large Tires	Stored outside	200/yr	---	200/yr	Yes	Tires are stored outside		√
Tire w/rims	Stored outside	5,000/yr	---	500/d	Yes	Tires are stored outside		√
Diesel fuel	Tank outside	4,000 gal/yr	---	1,000 gal/d	Yes	Storage tank is outside		√
Kerosene	Tank outside	250 gal/yr		250 gal/yr	Yes	Storage tank is outside		√

DESCRIPTION OF EXPOSED SIGNIFICANT MATERIAL

WORKSHEET #3A
Completed by: Brian Benson
Title: General Manager
Date: March 1, 2008

Instructions: Based on your material inventory, describe the significant materials that were exposed to storm water during the past three years and/or are currently exposed. For the definition of "significant materials" see Appendix B of the manual.

Description of Exposed Significant Material	Period of Exposure	Quantity Exposed (units)	Location (as indicated on the site map)	Method of Storage (e.g., pile, drum, tank)	Description of Material Management Practice (e.g., pile covered, drum sealed)
Shredded Tires	Current	60 Tons	Outside plant building	Pile	Shredded rubber tire material is piled outside for shipment. Runoff from the shredded rubber pile is forced to flow across an extensive grassy area before 100 ft. grassy buffer zone.
Oversize Tires	Current	200	Oversize Tire Area	Pile	Oversize tires that cannot be shredded are stored outside in the Oversize Tire Area. Tires are quartered so that they do not hold storm water. Runoff from the Oversize Tire Area is forced to flow across an extensive grassy area before 100 ft. grassy buffer zone.
Tires with Rims	Current	500	Rimmed Tire Area	Pile	Rimmed tires are stored outside in the Rimmed Tire Area until the rims are removed and the tires are shredded. Runoff from the Rimmed Tire Area is forced to flow across an extensive grassy area before 100 ft grassy buffer zone.
Diesel Fuel	Current	1,000 gal.	Tank Storage Area	Tank	Diesel fuel that is used for equipment is stored in a 1,000 gallon above ground tank. The storage tank is surrounded by an earthen dike for spill containment. Storm water that comes into contact with storage tank is contained inside the dike an allowed to evaporate or infiltrate.
Kerosene	Current	250 gal.	Tank Storage Area	Tank	Kerosene that is used for plant heating is stored in a 250 gallon above ground tank. The storage tank is surrounded by an earthen dike for spill containment. Storm water that comes into contact with storage tank is contained inside the dike an allowed to evaporate or infiltrate.

LIST OF SIGNIFICANT SPILLS AND LEAKS

WORKSHEET #4
Completed by: Brian Benson
Title: General Manager
Date: March 1, 2008

Instructions: Record below all significant spills and significant leaks of toxic or hazardous pollutants that have occurred at the facility in the three years prior to the effective date of the permit.

Definitions: Significant spills include, but are not limited to, releases of oil or hazardous substances in excess of reportable quantities.

1st Year Prior				Description				Response Procedure		
Date (mo/d/yr)	Spill	Leak	Location (as indicated on site map)	Type of Material	Quantity	Source	Reason	Amount of Material Recovered	Material No Longer Exposed to Storm Water (True/False)	Preventive Measures Taken

2nd Year Prior				Description				Response Procedure		
Date (mo/d/yr)	Spill	Leak	Location (as indicated on site map)	Type of Material	Quantity	Source	Reason	Amount of Material Recovered	Material No Longer Exposed to Storm Water (True/False)	Preventive Measures Taken

3rd Year Prior				Description				Response Procedure		
Date (mo/d/yr)	Spill	Leak	Location (as indicated on site map)	Type of Material	Quantity	Source	Reason	Amount of Material Recovered	Material No Longer Exposed to Storm Water (True/False)	Preventive Measures Taken

NON-STORM WATER DISCHARGE ASSESSMENT AND CERTIFICATION

WORKSHEET #5
Completed By: Brian Benson
Title: General Manager
Date: March 1, 2008

Date of Test or Evaluation	Outfall Directly Observed During the Test (identify as indicated on the site map)	Method Used to Test or Evaluate Discharge	Describe Results from Test for the Presence of Non-Storm Water Discharge	Identify Potential Significant Sources	Name of Person Who Conducted the Test or Evaluation
9/23/03	001	Visual Inspection	No Discharge Observed		L. Irish/J. Bryan
1/31/08	001	Visual Inspection	No Discharge Observed		L. Irish/B. Benson

I, _____ (responsible corporate official), certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

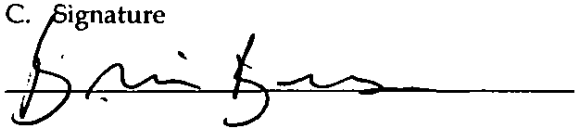
A. Name & Official Title (type or print)

Brain Benson, General Manager

B. Area Code and Telephone No.

318-371-6692

C. Signature



D. Date Signed

3-5-08

Field Notebook

For Non-Storm Water Discharge Inspections

Inspection Team:
Brian Benson

Completed By: _____
Date: _____
Time: _____

Time Since Last Rain: _____
Quantity of Last Rain: _____
Flow Observed: _____

Comments:

_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____
_____

Signature: _____ Date: _____

Benson Environmental Services of Louisiana, Inc.
Existing Monitoring Data

September 23, 2003
Revised: March 1, 2008

Wastewater Discharge Monitoring Results

Benson Environmental Services of Louisiana, Inc. does not have any non-storm water industrial wastewater discharges, and therefore, does not have a LPDES Permit. As a result, no wastewater monitoring data is available.

Storm Water Discharge Monitoring Results

Benson Environmental Services of Louisiana, Inc. has not conducted any storm water monitoring as of this date.

Benson Environmental Services of Louisiana, Inc.
Site Assessment Inspection for Pollutants

September 23, 2003
Revised: October 1, 2008

Pollutant Sources

There are six areas where material handling and storage activities take place that are exposed to rain fall events.

7. The tire receiving area is a paved area outside the plant building. Incoming trucks deliver the tires to the plant by backing up to the receiving area of the plant. The tires are then unloaded individually by hand. As each tire is unloaded, the tire is visually inspected for foreign materials such as dirt, oil, grease, or other debris. Any tire found to contain any foreign material which could be a source of pollution is rejected and not allowed off the truck and onto the plant property. During a rainfall event, incoming tires would be exposed to storm water momentarily until the tire is brought inside the plant building. Storm water runoff from this area is collected by a storm water drain in the pavement, where it is then piped to within 300 feet of Outfall 001.

8. The shredded tire storage area is a paved area located outside the plant building. The shredded tire material is piled to await shipment from the facility. During rainfall events, the shredded tire piles are exposed to storm water. Pollution is controlled by not allowing any tires to be received (and hence shredded) which contain foreign debris that could contribute pollutants to the storm water. The shredded tire material itself is not known to be a contributor of pollutants. However, it is possible that the shredded tire material could introduce metals, particularly zinc, to the storm water. Storm water runoff from this area overland flows across approximately 400 feet of grassy area before reaching Outfall 001.

9. The oversize tire storage area is a 2-3 acre site located outside the plant building where oversize tires are stored. Oversize tires are tires that are too large to be shredded by the shredding machine (i.e., large tractor tires, etc.). It is a policy of Benson Environmental Services of Louisiana, Inc. not to accept tires that are too large to be shredded onto the property. However, certain circumstances dictate that some oversize tires be accepted each year. The tires, once received onto the property, are cut into quarters by a tire shear. The tire quarters are then transported to a permitted landfill for disposal. While in storage awaiting transport to the landfill, the tire quarters are exposed to storm water. The act of quartering the tires is itself a pollution prevention measure in that the quartered tire parts do not accumulate storm water. The quartered tire material itself is not known to be a contributor of pollutants. However, it is possible that the quartered tire material could introduce metals, particularly zinc, into the storm water. Under no circumstances does Benson Environmental receive oversize tires that contain foreign debris which could contribute pollutants to the storm water. Storm water runoff from this area overland flows across approximately 600 feet of grassy area before reaching Outfall 001.

10. The rimmed tire storage area is located outside the main plant building and exposed to storm water. Under certain circumstances, tires are received that still contain the wheel rims. These tires must first undergo having the rims removed before they can be brought into the plant building for shredding. The rims are removed by hand in the rimmed tire storage area. The tires are then brought into the building for shredding and the rims are placed in a

dumpster for disposal. During the time that the tires are awaiting having the rims removed, they are exposed to storm water. The tires and rims themselves are not known to be contributors of pollutants. However, it is possible that these materials could introduce metals, particularly zinc, into the storm water. Under no circumstances does Benson Environmental receive rimmed tires that contain foreign debris which could contribute pollutants to the storm water. Storm water runoff from this area overland flows across approximately 600 feet of grassy area before reaching Outfall 001.

11. The equipment fueling area is located outside the plant building and contains a 1,000 gallon capacity diesel fuel tank. This fuel is used for the front end loaders that load out the shredded tire material as well as the track hoe which operates the oversize tire shear. The area is not a paved area. An existing earthen dike surrounding the diesel tank provides containment in the event of a tank spill. Storm water that collects inside the dike area is allowed to evaporate. Storm water runoff from this area will overland flow across approximately 600 feet of grassy area before reaching Outfall 001.

12. The kerosene storage tank is used to store kerosene used for plant heating during the winter months. This is a 250 gallon capacity tank which is surrounded by an earthen dike for spill containment. Storm water that collects inside the dike area is allowed to evaporate. Storm water runoff from this area will overland flow across approximately 600 feet of grassy area before reaching Outfall 001.

Describe existing management practices

1. All areas surrounding the plant building and storage areas are heavily planted in grass. Good grass cover is maintained by fertilizing and cutting the grass for hay.

2. The fuel storage tanks have dikes constructed in accordance with the SPCC Plan.

3. All plant personnel are instructed to regularly pick up trash and maintain other "good housekeeping" practices. Used oils are collected and taken to a recycling facility.

4. All tires being received at the facility (i.e., regular tires, oversized tires, and rimmed tires) are individually inspected visually for dirt, oil, grease, and other debris which could contribute pollutants to the storm water.

POLLUTANT SOURCE IDENTIFICATION

WORKSHEET #7
Completed By: Brian Benson
Title: General Manager
Date: March 1, 2008

Instructions: List all identified storm water pollutant sources and describe existing management practices that address those sources. In the third column, list BMP options that can be incorporated into the plan to address remaining sources of pollutants.

Storm Water Pollutant Sources	Existing Management Practices	Descriptions of New BMP Options
Tire Receiving Area	Tire receiving area is paved. Tires would only be momentarily exposed to storm water if receiving was conducted during rainfall events. 600 feet grassy runoff zone prior Outfall 001	
Shredded Tire Storage	Tires are visually inspected in receiving and those tires with dirt, oil, grease, and other debris are not accepted. There is approx. 400 feet of grassy runoff zone prior outfall 001.	
Oversized Tire Storage	Oversize tires are visually inspected during receiving. Tires are cut into quarters to prevent holding water. There is approx. 600 feet of grassy runoff zone prior to outfall 001.	
Rimmed Tire Storage	Rimmed tires are visually inspected during receiving. Tires are de-rimmed as soon as possible and moved to inside storage. Approx. 600 feet of grassy runoff zone prior to outfall 001.	
Diesel Fueling Area	Fueling area not on pavement. Spill containment dike contains spills & tank runoff. Runoff is allowed to evaporate.	
Kerosene Storage	Storage area is not on pavement. Spill containment dike contains spills & tank runoff. Runoff is allowed to evaporate.	

Benson Environmental Services of Louisiana, Inc.
Storm Water Pollution Prevention Plan

BMP IDENTIFICATION

BMP IDENTIFICATION

WORKSHEET #7A
Completed By: Brian Benson
Title: General Manager
Date: March 1, 2008

Instructions: Describe the Best Management Practices that you have selected to include in your plan. For each of the baseline BMPs, describe actions that will be incorporated into facility operations. Also describe any additional BMPs (activity-specific and site-specific BMPs) that you have selected.

BMPs	Brief Description of Activities
Good Housekeeping	Regular trash pickup. Train all employees in basic clean up procedures (i.e., sweeping shop and unloading areas). Collect and recycle used oil.
Preventative Maintenance	Daily inspection of plant equipment following manufacturer's recommended preventative maintenance measures.
Inspections	Daily inspection of outside shredded tire storage area, oversize tire storage area, rimmed tire storage area, diesel storage area, and kerosene storage area. Quarterly inspection of grassy runoff zone, storm water inlet, and outfall 001.
Spill Prevention Response	Containment dikes are in place around diesel and kerosene tanks.
Sediment and Erosion Control	Maintain grass on the entirety of the property.
Management of Runoff	Maintain 100 ft. grassy buffer zone around property. Maintain grassy runoff areas on property. Swale property to divert runoff from plant and storage areas.
Additional BMPs (Activity-specific and Site-specific)	Tire receiving procedures to prevent tires with oil, grease, dirt, etc. on the property.

SOURCE REDUCTION BMPS
PROCEDURE NO. BES-SWPPP-010
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to summarize the source reduction BMPs that are incorporated in the Storm Water Pollution Prevention Plan.

2.0 Scope

Source reduction BMPs that are incorporated in the Storm Water Pollution Prevention Plan of the Benson Environmental Services of Louisiana, Inc. tire shredding facility.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement and maintain source reduction BMPs for the purpose of eliminating potential contaminants at the source, and therefore eliminating the possibility that these contaminants will come into contact with storm water.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3. Measures and Controls

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Source Reduction BMPs

7.1 General Manager

The BES General Manager is responsible for implementing and overseeing the source reduction BMPs in use at the tire shredding facility. The source reduction BMPs that are utilized at the tire shredding facility include the following:

- Good housekeeping practices;
- Materials management practices;
  - Materials receiving control

- Inventory control
- Used oil recycling

- ❑ Preventive maintenance
- ❑ Spill prevention and response
- ❑ Employee training

8.0 Related Procedures

- ❑ BES Procedure BES-SWPPP-004: Good Housekeeping
- ❑ BES Procedure BES-SWPPP-004a: Good Housekeeping - Operation & Maintenance
- ❑ BES Procedure BES-SWPPP-004b: Good Housekeeping - Material Storage Practices
- ❑ BES Procedure BES-SWPPP-004c: Good Housekeeping - Inventory Control
- ❑ BES Procedure BES-SWPPP-004d: Good Housekeeping - Employee Participation
- ❑ BES Procedure BES-SWPPP-005: Preventive Maintenance - SWPPP
- ❑ BES Procedure BES-SWPPP-006: Visual Inspections
- ❑ BES Procedure BES-SWPPP-007: Spill Prevention and Response
- ❑ BES Procedure BES-SWPPP-008: Sediment and Erosion Control
- ❑ BES Procedure BES-SWPPP-009: Management of Runoff
- ❑ BES Procedure BES-SWPPP-013: Tire Receiving Practices
- ❑ BES Procedure BES-SWPPP-014: Used Oil Recycle

CONTAINMENT/DIVERSION BMPS
PROCEDURE NO. BES-SWPPP-011
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to summarize the containment/diversion BMPs that are incorporated in the Storm Water Pollution Prevention Plan.

2.0 Scope

All containment/diversion BMPs that are incorporated in the Storm Water Pollution Prevention Plan of the Benson Environmental Services of Louisiana, Inc. tire shredding facility.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement and maintain containment/diversion BMPs for the purpose of eliminating the contact of storm water with potential contaminants.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3. Measures and Controls

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Containment/Diversion BMPs

7.1 General Manager

The BES General Manager is responsible for implementing and maintaining the containment/diversion BMPs in use at the tire shredding facility. The containment/diversion BMPs that are utilized at the tire shredding facility include the following:

- Berm diesel and kerosene storage tanks;
- Grassy swales used to divert storm water flow away from plant and outside material storage areas

8.0 Related Procedures

- BES Procedure BES-SWPPP-004: Good Housekeeping
- BES Procedure BES-SWPPP-004a: Good Housekeeping - Operation & Maintenance
- BES Procedure BES-SWPPP-004b: Good Housekeeping - Material Storage Practices
- BES Procedure BES-SWPPP-004c: Good Housekeeping - Inventory Control
- BES Procedure BES-SWPPP-004d: Good Housekeeping - Employee Participation
- BES Procedure BES-SWPPP-005: Preventive Maintenance - SWPPP
- BES Procedure BES-SWPPP-006: Visual Inspections
- BES Procedure BES-SWPPP-007: Spill Prevention and Response
- BES Procedure BES-SWPPP-008: Sediment and Erosion Control
- BES Procedure BES-SWPPP-009: Management of Runoff
- BES Procedure BES-SWPPP-013: Tire Receiving Practices
- BES Procedure BES-SWPPP-014: Used Oil Recycle

USED OIL RECYCLING
PROCEDURE NO. BES-SWPPP-014
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to define the used oil recycling practices that are incorporated in the Storm Water Pollution Prevention Plan.

2.0 Scope

Used oil recycling practices that are incorporated in the Storm Water Pollution Prevention Plan of the Benson Environmental Services of Louisiana, Inc. tire shredding facility.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement and maintain a used oil recycling program that is consistent with source reduction BMPs for the purpose of eliminating potential contaminants before they come into contact with storm water.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3. Measures and Controls

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Used Oil Recycling Practices

7.1 General Manager

The BES General Manager is responsible for overseeing the used oil recycling practices in use at the tire shredding facility. All used oil will be collected and disposed of at a oil recycling facility. Collection containers will be placed in appropriate areas and all employees will be trained and encouraged to recycle all oils used by plant manufacturing and material handling equipment.

8.0 Related Procedures

- BES Procedure BES-SWPPP-004: Good Housekeeping
- BES Procedure BES-SWPPP-004d: Good Housekeeping – Employee Participation
- BES Procedure BES-SWPPP-015: Employee Training

TREATMENT BMPS
PROCEDURE NO. BES-SWPPP-012
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to summarize the treatment BMPs that are incorporated in the Storm Water Pollution Prevention Plan.

2.0 Scope

All treatment BMPs that are incorporated in the Storm Water Pollution Prevention Plan of the Benson Environmental Services of Louisiana, Inc. tire shredding facility.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement and maintain treatment BMPs for the purpose of removing pollutants from the storm water runoff prior to the runoff reaching Outfall 001.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3. Measures and Controls

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Treatment BMPs

7.1 General Manager

The BES General Manager is responsible for implementing and maintaining the treatment BMPs in use at the tire shredding facility. The treatment BMPs that are utilized at the tire shredding facility include the following:

- 100 foot grassy buffer zone around the entirety of the property;
- Grassy swales used to divert storm water to Outfall 001

8.0 Related Procedures

- BES Procedure BES-SWPPP-004: Good Housekeeping
- BES Procedure BES-SWPPP-004a: Good Housekeeping - Operation & Maintenance
- BES Procedure BES-SWPPP-004b: Good Housekeeping - Material Storage Practices
- BES Procedure BES-SWPPP-004c: Good Housekeeping - Inventory Control
- BES Procedure BES-SWPPP-004d: Good Housekeeping - Employee Participation
- BES Procedure BES-SWPPP-005: Preventive Maintenance - SWPPP
- BES Procedure BES-SWPPP-006: Visual Inspections
- BES Procedure BES-SWPPP-007: Spill Prevention and Response
- BES Procedure BES-SWPPP-008: Sediment and Erosion Control
- BES Procedure BES-SWPPP-009: Management of Runoff
- BES Procedure BES-SWPPP-013: Tire Receiving Practices
- BES Procedure BES-SWPPP-014: Used Oil Recycle

"ACTIVITY-SPECIFIC" BMP
TIRE RECEIVING PRACTICE
PROCEDURE NO. BES-SWPPP-013
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to define the tire receiving practice and its applicability as an "Activity-Specific" source reduction BMP incorporated in the Storm Water Pollution Prevention Plan.

2.0 Scope

Tire receiving practices that are incorporated in the Storm Water Pollution Prevention Plan of the Benson Environmental Services of Louisiana, Inc. tire shredding facility.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement and maintain tire receiving practices that are consistent with source reduction BMPs for the purpose of eliminating potential contaminants before they are on the property.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3. Measures and Controls

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Tire Receiving Practices

7.1 General Manager

The BES General Manager is responsible for overseeing tire receiving practices in use at the tire shredding facility. All incoming tires received at the facility will be individually unloaded by hand. During the unloading process, each tire is visually inspected for dirt, oil, grease, and other debris that could contribute pollutants to the storm water. If any tire is found to have dirt, oil,

grease, or other debris, that tire will be rejected and not allowed into the facility. In this manner, the tire receiving practice at the facility is implemented as an "Activity-Specific" BMP.

8.0 **Related Procedures**

- BES Procedure BES-SWPPP-004: Good Housekeeping
- BES Procedure BES-SWPPP-004d: Good Housekeeping - Employee Participation
- BES Procedure BES-SWPPP-015: Employee Training

GOOD HOUSEKEEPING
PROCEDURE NO. BES-SWPPP-004
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to ensure that good housekeeping practices are included in the Storm Water Pollution Prevention Plan. Often the most effective first step towards preventing pollution in storm water from industrial sites simply involves using good common sense to improve the facility's basic housekeeping methods. Poor housekeeping can result in more waste being generated than necessary and an increased potential for storm water contamination.

2.0 Scope

The scope of this section includes all personnel, material handling practices, and good housekeeping practices at the tire shredding facility of Benson Environmental Services of Louisiana, Inc.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will promote and maintain good housekeeping practices which will help reduce the potential for storm water contamination from the tire shredding facility.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.a Good Housekeeping

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Good Housekeeping Responsibility

7.1 General Manager

The BES General Manager is responsible for promoting and overseeing that good housekeeping practices are performed at the tire shredding facility. Specifically, the General Manager ensure good housekeeping through the following practices:

- Improved operation and maintenance of industrial machinery and processes;
- Material storage practices;
- Material inventory controls;
- Routine and regular clean-up schedules;
- Maintaining well organized work areas; and
- Educational programs for employees.

8.0 Related Procedures

- BES-SWPPP-004a: Good Housekeeping - Operation & Maintenance
- BES-SWPPP-004b: Good Housekeeping - Material Storage
- BES-SWPPP-004c: Good Housekeeping - Material Inventory
- BES-SWPPP-004d: Good Housekeeping - Employee Participation
- BES-SWPPP-016: Employee Training - Good Housekeeping

GOOD HOUSEKEEPING:
OPERATION & MAINTENANCE
PROCEDURE NO. BES-SWPPP-004A.
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to ensure that good housekeeping practices are conducted during the operation and maintenance of the tire shredding facility.

2.0 Scope

The scope of this section includes the integration of good housekeeping practices with operational and maintenance practices at the tire shredding facility of Benson Environmental Services of Louisiana, Inc.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will promote and maintain good housekeeping practices during the operation and maintenance of the equipment at the tire shredding facility.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.a	Good Housekeeping

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMP	Best Management Practice
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Operation and maintenance Good Housekeeping Responsibility

7.1 General Manager

The BES General Manager is responsible for promoting and overseeing that good housekeeping practices are performed during the operation and maintenance of the tire shredding facility. Specifically, the General Manager will ensure good housekeeping through the following practices which ensure that processes and equipment are working well:

- Maintain dry and clean floors and ground surfaces by using brooms, shovels, vacuum cleaners, or cleaning machines;
- Regularly pickup and dispose of garbage and waste material;
- Make sure that equipment is working well;;
- Routinely inspect for leaks or conditions that could lead to discharges of chemicals or contact of storm water with raw materials, intermediate materials, waste materials, or products; and,
- Ensure that spill cleanup procedures are understood by employees.

8.0 Related Procedures

- BES-SWPPP-004: Good Housekeeping
- BES-SWPPP-004b: Good Housekeeping - Material Storage
- BES-SWPPP-004c: Good Housekeeping - Material Inventory
- BES-SWPPP-004d: Good Housekeeping - Employee Participation
- BES-SWPPP-016: Employee Training - Good Housekeeping

GOOD HOUSEKEEPING:
MATERIAL STORAGE PRACTICES
PROCEDURE NO. BES-SWPPP-004B
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to ensure that good housekeeping practices are integrated with material storage practices at the tire shredding facility.

2.0 Scope

The scope of this section includes the integration of good housekeeping practices with material storage practices at the tire shredding facility of Benson Environmental Services of Louisiana, Inc.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will integrate good housekeeping practices with material storage practices at the tire shredding facility.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.a Good Housekeeping

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMP	Best Management Practice
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Material Storage/Good Housekeeping Responsibility

7.1 General Manager

The BES General Manager is responsible for promoting and overseeing that good housekeeping practices are integrated with material storage practices. Specifically, the General Manager will ensure good housekeeping through the following material storage practices:

- Provide adequate aisle space to facilitate material transfer and easy access for inspections;

- Store containers, drums, and bags away from direct traffic routes to prevent accidental spills;
- Stack containers according to manufacturer's instructions to avoid damaging the containers from improper weight distribution;
- Store containers on pallets or similar devices to prevent corrosion of the containers which can result when containers come into contact with moister on the ground; and
- Assign the responsibility of hazardous material inventory to a limited number of people who are trained to handle hazardous materials.

8.0 Related Procedures

- BES-SWPPP-004: Good Housekeeping
- BES-SWPPP-004a: Good Housekeeping - Operation & Maintenance
- BES-SWPPP-004c: Good Housekeeping - Material Inventory
- BES-SWPPP-004d: Good Housekeeping - Employee Participation
- BES-SWPPP-016: Employee Training - Good Housekeeping

GOOD HOUSEKEEPING:
MATERIAL INVENTORY PRACTICES
PROCEDURE NO. BES-SWPPP-004C
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to ensure that good housekeeping practices are integrated with material inventory practices at the tire shredding facility.

2.0 Scope

The scope of this section includes the integration of good housekeeping practices with material inventory practices at the tire shredding facility of Benson Environmental Services of Louisiana, Inc.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will integrate good housekeeping practices with material inventory practices at the tire shredding facility.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.a Good Housekeeping

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMP	Best Management Practice
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March1, 2008

7.0 Material Inventory/Good Housekeeping Responsibility

7.1 General Manager

The BES General Manager is responsible for promoting and overseeing that good housekeeping practices are integrated with material inventory practices. Specifically, the General Manager will ensure good housekeeping through the following material inventory practices:

- Identify all chemical substances present in the workplace. Walk through the facility and review the purchase orders for the previous year. List all of the chemical substances used in the workplace, and then obtain the Material Safety Data Sheets (MSDS) for each;
- Label all containers to show the name and type of substance, stock number, expiration date, health hazards, suggestions for handling; and first aid information. Unlabeled chemicals and chemicals with deteriorated labels are often disposed of unnecessarily or improperly.
- Clearly mark on the inventory hazardous materials that require special handling, storage, use, and disposal considerations.
- Work to improve material tracking and inventory practices to reduce the waste that results from overstocking and the disposal of out-of-date materials.

8.0 Related Procedures

- BES-SWPPP-004: Good Housekeeping
- BES-SWPPP-004a: Good Housekeeping - Operation & Maintenance
- BES-SWPPP-004b: Good Housekeeping – Material Storage
- BES-SWPPP-004d: Good Housekeeping - Employee Participation
- BES-SWPPP-016: Employee Training - Good Housekeeping

GOOD HOUSEKEEPING:
EMPLOYEE PARTICIPATION
PROCEDURE NO. BES-SWPPP-004D
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to ensure employee participation with good housekeeping practices at the tire shredding facility.

2.0 Scope

The scope of this section includes all employees at the tire shredding facility of Benson Environmental Services of Louisiana, Inc.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will promote employee participation with good housekeeping practices at the tire shredding facility.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.a Good Housekeeping

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMP	Best Management Practice
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
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USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Employee Participation/Good Housekeeping Responsibility

7.1 General Manager

The BES General Manager is responsible for promoting and overseeing that each employee practices good housekeeping measures. Specifically, the General Manager will ensure good housekeeping through the following employee participation practices:

- Incorporate informational sessions on good housekeeping practices into the facility's employee training program;
- Discuss good housekeeping at employee meetings;

- Publicize pollution prevention concepts through posters;
- Post bulletin boards with updated good housekeeping procedures, tips and reminders.

8.0 Related Procedures

- BES-SWPPP-004: Good Housekeeping
- BES-SWPPP-004a: Good Housekeeping - Operation & Maintenance
- BES-SWPPP-004b: Good Housekeeping - Material Storage
- BES-SWPPP-004c: Good Housekeeping - Material Inventory
- BES-SWPPP-016: Employee Training - Good Housekeeping

VISUAL INSPECTIONS
PROCEDURE NO. BES-SWPPP-006
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to define routine visual inspection elements that will ensure that all elements of the Storm Water Pollution Prevention Plan are in place and working.

2.0 Scope

Routine visual inspections are not meant to be a comprehensive evaluation of the entire storm water pollution prevention program...that is the function of the Annual Site Inspection and Site Evaluation described later in this plan. Rather, they are meant to be a routine look-over of the facility to identify conditions which may give rise to contamination of storm water runoff with pollutants from the facility.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement a visual inspection program designed to be a routine look-over of the facility to identify conditions which may give rise to contamination of storm water runoff with pollutants from the facility .

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.d Visual Inspections

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMP	Best Management Practice
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Visual Inspection Program

7.1 General Manager

The BES General Manager is responsible for implementing and overseeing the visual inspection program. Only the General Manager, and who so ever he designates as qualified, shall perform the visual inspection of the plant equipment and material storage areas. Specifically, the General

Manager will ensure a regulatory compliant visual inspection program by inspecting the following areas:

- Areas around all of the equipment listed in the preventive maintenance program;
- Areas where spills have occurred in the past;
- Material storage areas;
- Outdoor material processing areas;
- Material handling areas; and,
- Waste generation, storage, treatment and disposal areas.

8.0 Related Procedures

- Visual Inspection Checklist
- BES-SWPPP-016: Employee Training - Good Housekeeping

Benson Environmental Services of Louisiana
Good Housekeeping and General Site Inspection Checklist

YES	NO	
☐	☐	Does the facility show signs of poor housekeeping (cluttered walkways, unswept floors, uncovered materials, etc.)?
☐	☐	Are there spots, pools, puddles, or other traces of oil, grease, or other chemicals on the ground?
☐	☐	Is there discoloration, residue, or corrosion on the roof or ground or around vents or pipes that ventilate or drain the work area?
☐	☐	Do you see leaking equipment, pipes, containers, or lines?
☐	☐	Are there areas where absorbent materials (kitty litter, saw dust, etc.) are regularly used?
☐	☐	Do you notice signs such as smoke, dirt, or fumes that indicate material losses?
☐	☐	Do you smell strange odors, or experience eye, nose, or throat irritation when you first enter the work area? These are indications of equipment leaks.
☐	☐	Do storage containers show signs of corrosion or leaks?
☐	☐	Are there open containers, stacked drums, shelving too small to properly handle inventory, or other indications of poor storage procedures?
☐	☐	Are containers properly labeled?
☐	☐	Are outside areas kept in a neat and orderly condition?
☐	☐	Is there evidence of drips or leaks from equipment or machinery onsite?
☐	☐	Is the facility orderly and neat?
☐	☐	Is there adequate space in the work areas?
☐	☐	Is garbage removed regularly?
☐	☐	Are walkways and passage ways easily accessible, safe, and free of protruding objects, materials, and equipment?
☐	☐	Is there evidence od dust on the ground from industrial operations or processes?
☐	☐	Are cleanup procedures used for spilled solids?
☐	☐	Is good housekeeping included in the employee program?

☐	☐	Are good housekeeping procedures and reminders posted in appropriate locations around the workplace?
☐	☐	Are there regular housekeeping inspections?

Do you see any of the following:

YES	NO	
☐	☐	Corroded drums or drums without plugs or covers?
☐	☐	Corroded or damaged tanks, tank supports, and tank drain valves?
☐	☐	Torn bags or bags exposed to rain water?
☐	☐	Corroded or leaking pipes?
☐	☐	Leaking or improperly closed valves and valve fittings?
☐	☐	Leaking pumps and/or hose connections?
☐	☐	Broken or cracked dikes, walls, or other physical barriers designed to prevent storm water from reaching stored material?
☐	☐	Windblown dry chemical?
☐	☐	Improperly maintained or overloaded dry chemical conveying systems?

PREVENTIVE MAINTENANCE: SWPPP
PROCEDURE NO. BES-SWPPP-005
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to expand current preventive maintenance practices to include storm water considerations, especially the upkeep and maintenance of storm water management devices.

2.0 Scope

Preventive maintenance involves the regular inspection and testing of plant equipment and operational systems. These inspections should uncover conditions such as cracks or slow leaks which could cause breakdown or failures that result in discharges oc chemicals to storm sewers and surface waters. The program should prevent breakdowns and failures by adjustment, repair or replacement of equipment.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement a preventive maintenance program that includes storm water considerations.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.b	Preventive Maintenance

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMP	Best Management Practice
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2ND) March 1, 2008

7.0 Preventive Maintenance Programs

7.1 General Manager

The BES General Manager is responsible for implementing and overseeing the preventive maintenance program. Specifically, the General Manager will ensure a regulatory compliant preventive maintenance program by including the following practices:

- ❑ Identify the equipment to inspect. The equipment included in the preventive maintenance program should include, but not necessarily be limited to:
  - Pipes
  - Pumps
  - Storage tanks and bins
  - Pressure vessels
  - Pressure release valves
  - Process and material handling equipment
  - Storm water management devices (oil/water separators, catch basins, or other structural or treatment BMPs)

- ❑ Schedule routine preventive maintenance inspections.
- ❑ Promptly repair or replace defective equipment found during inspections and testings.
- ❑ Keep spare parts for equipment that needs frequent repair.
- ❑ Implement a records system for scheduling tests and documenting inspections in the preventive maintenance program. Record test results and follow up with corrective action.
- ❑ The following inspection requirements are for facilities subject to reporting under EPCRA, Section 313 for water priority chemicals. These inspections must take place on regular intervals based on facility design and operational experience. Inpsections of diesel and kerosene tank facilities should take place daily or no less often than equipment is refueled. All other inspections should take place no less than monthly. When a leak or other threatening condition is found, corrective action must be taqken immediately or the facility unit or process must be shut down until the problem is repaired.

  1. Inspect for leaks or conditions that would lead to discharges of Section 313 water priority chemicals (i.e., diesel, kerosene, etc.);
  2. Inspect for conditions that could lead to direct contact of storm water with raw materials, intermediate materials, waste materials or products;
  3. Inspect piping, pumps, storage tanks and bins, pressure vessels, process and material handling equipment, and material bulk storage area for leaks, wind blowing, corrosion, support or foundation failure, or other deterioration or noncontainment.

8.0 Related Procedures

SPILL PREVENTION AND RESPONSE
PROCEDURE NO. BES-SWPPP-007
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to define the Spill Prevention and Response Program that is incorporated as an element of the Storm Water Pollution Prevention Plan.

2.0 Scope

The scope of this procedure addresses both small (i.e., less than 5 gallons) and large spills at the Benson Environmental Services of Louisiana, Inc. tire shredding facility.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement and maintain a spill prevention and response program, including, employee training in spill prevention and response, and providing appropriate spill clean-up equipment to personnel.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.e Spill Prevention and Response

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMP	Best Management Practice
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Spill Prevention and Response

7.1 General Manager

The BES General Manager is responsible for implementing and overseeing the spill prevention and response program, including, but not necessarily limited to::

- Identify areas where spills can occur onsite and their drainage points;
- Identify areas where spills have occurred in the past;
- Specify and oversee material handling procedures, storage requirements, and the use of spill prevention and cleanup equipment;

- Identify procedures used for cleaning up spills and instruct personnel about these procedures; and,
- Ensure that appropriate spill clean-up equipment is available to all personnel.

7.2 Areas where spills may occur

The following are areas where spills are most likely to occur, and the most likely cause of the spill, at the tire shredding facility:

Potential Spill Area	Most Likely Cause of Spill
Small Spills (i.e., less than 5 gallons)	
❑ Tire receiving apron	Poorly maintained delivery vehicles
❑ Inside Plant	Spillage from maintenance of machinery
❑ Outside storage areas	Leakage from material handling equipment
Large Spills	
❑ Diesel and kerosene area	Tank leak, piping or valve leak, spills from refueling, etc.

7.3 Spill Response

The plant equipment operators on-site during a spill event shall be responsible for responding as follows:

- Identify the character, exact source, amount, and extent of any released chemicals;
- Take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, reoccur, or spread to other hazardous waste or hazardous material at the facility;
- Determine if facility personnel can control the situation;
- Assess hazards to the environment and human health;
- Determine if evacuation of the local area is advisable. If so, notify local authorities.
- Response personnel are to be properly equipped (safety equipment, clothing, and respiratory protection)
- Response personnel are to approach the leaking cylinder/drum or spilled material from an upwind direction.
- If possible use dikes, absorbent or neutralizing agents, as necessary to contain the spill to the smallest area possible.
- If the spilled material is unrecoverable, treat, or absorb the material
- Remove containerized spill, absorbed material or contaminated soil.
- Clean, restore, and replace spill response equipment and return to original location.

7.4 Notification of Control Agencies

The following table provides a summary of the control agencies that should be contacted in the event of an emergency. The following information should be provided to each agency contacted:

- Respondent's name and telephone number
- Location of spill
- Time and type of incident
- Name and quantity of material
- Containment and control
- Measures extent of injury, if any.

Emergency Contact List

Agency	Phone Number
Emergency Fire and Medical Services	911
National Response Center	1-800-424-8802
Office of Environmental Response of the Louisiana Department of Environment Quality	1-225-342-1234
State Emergency Response Commission	1-225-925-6595
Additional Information Services, Chemtrec	1-800-424-9300

7.5 First Aid Procedures

Operators shall become familiar with the first aid procedures given on the MSDS for diesel, kerosene, and other potential contaminants used in substantial quantites in the tire shredding facility.

7.6 Follow-up Activities

Report emergency incidents to the following agencies as required:

- Louisiana Department of Environmental Quality (DEQ)
- United States Environmental Protection Agency (EPA)
- Louisiana State Police (Hazardous Substance Control Section)
- Right-to-Know (State Emergency Response Commission)
- Local Emergency Planning Committee (LEPC)/Office of Emergency Preparedness (OEP)

8.0 Related Procedures

- BES-SWPPP-015: Employee Training - Spill Prevention and Response

SEDIMENT AND EROSION CONTROL
PROCEDURE NO. BES-SWPPP-008
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to define sediment and erosion control practices that are incorporated in the Storm Water Pollution Prevention Plan.

2.0 Scope

The scope of this procedure addresses sediment and erosion control on the property of the Benson Environmental Services of Louisiana, Inc. tire shredding facility.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement and maintain a sediment and erosion control program.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.h Sediment and Erosion Control

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMP	Best Management Practice
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Sediment and Erosion Control

7.1 General Manager

The BES General Manager is responsible for implementing and overseeing the sediment and erosion control program, which includes, but not necessarily limited to, the following elements:

- Routine inspection of grassy areas located around outside material storage areas, inside the 100 foot buffer zone, and inside and along drainage ways leading to Outfall 001.
- Identify areas where erosion has occurred.
- Follow-up to ensure that eroded areas are re-graded and re-seeded as required.

7.3 Office Manager

The BES Office Manager is responsible to maintain contracts with farmers who cut the grass on the property for hay.

8.0 Related Procedures

MANAGEMENT OF RUNOFF
PROCEDURE NO. BES-SWPPP-009
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to define practices used to direct storm water away from areas of exposed materials or potential pollutants that are incorporated in the Storm Water Pollution Prevention Plan.

2.0 Scope

Many BMPs utilized in storm water pollution prevention plans focus on measures used to reduce pollutants at the source before they have an opportunity to contaminate storm water runoff. The scope of this procedure addresses more traditional storm water management practices that can be used to direct storm water away from areas of exposed materials or potential pollutants on the property of the Benson Environmental Services of Louisiana, Inc. tire shredding facility.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement and maintain a runoff management and control program.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.i Management of Runoff

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMP	Best Management Practice
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Management of Runoff

7.1 General Manager

The BES General Manager is responsible for implementing and overseeing the runoff management and control program, which includes, but not necessarily limited to, the following elements:

- Establish and maintain of grassy swales, ditches, etc. used to divert storm water runoff from entering outside areas where materials are stored.
- Routine inspection of grassy areas located around outside material storage areas, inside the 100 foot buffer zone, and inside and along drainage ways leading to Outfall 001.
- Identify areas where erosion has occurred.
- Follow-up to ensure that eroded areas are re-graded and re-seeded as required.

8.0 Related Procedures

Benson Environmental Services of Louisiana, Inc.
Storm Water Pollution Prevention Plan

IMPLEMENTATION

IMPLEMENTATION

WORKSHEET #8
Completed By: Brian Benson
Title: General Manager
Date: March 1, 2008

Instructions: Develop a schedule for implementing each BMP. Provide a brief description of each BMP, the steps necessary to implement the BMP (i.e., any construction or design), the schedule for completing those steps (list dates) and the person(s) responsible for implementation.

BMPs	Description of Activities Required for Implementation	Scheduled Completion Date(s) for Req'd. Action	Person Responsible for Action	Notes
Good Housekeeping	Develop training program Conduct training			
Preventative Maintenance	Develop training program Conduct training			
Inspections	Inspections schedule in-place			
Spill Prevention Response	Spill prevention measures in place			
Sediment and Erosion Control	Grassy areas are in place			
Management of Runoff	BMPs are in place			
Additional BMPs (Activity-specific and Site-specific)				

EMPLOYEE TRAINING

WORKSHEET #9
Completed By: Brian Benson
Title: General Manager
Date: March 1, 2008

Instructions: Describe the employee training program for your facility below. The program should, at minimum, address spill prevention and response, good housekeeping, and material management practices. Provide a schedule for the training program and list the employees who attend training sessions.

Training Topics	Brief Description of Training Program/Materials (e.g., film, newsletter, course)	Schedule for Training (list dates)	Attendees
Spill Prevention Response	Locate spill areas by signs, drill spill response procedures, discuss past spills.		All Employees
Good Housekeeping	Demonstration and discussion		All Employees
Material Management Practices	Tire unloading, oversize tire quartering, rimmed tire handling		All Employees
Other Topics	Storm Water Pollution Prevention		

EMPLOYEE TRAINING:
SPILL PREVENTION AND RESPONSE
PROCEDURE NO. BES-SWPPP-015
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is define the spill prevention and response employee training program that is incorporated in the Storm Water Pollution Prevention Plan.

2.0 Scope

All employees that are involved in industrial activities are to be trained in spill prevention and response.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement, maintain, and regularly schedule spill prevention and response employee training classes for all employees involved in industrial activity at the tire shredding facility.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.e Employee Training

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Employee Training – Spill Prevention and Response

7.1 General Manager

The BES General Manager is responsible for implementing, scheduling and conducting employee training classes pertaining to spill prevention and response. Specifically, all employees involved in industrial activities will be trained about the following measures:

- Identifying potential spill areas and drainage routes, including information on past spills;

- Reporting spills to appropriate individuals, without penalty (e.g., employees should be provided "amnesty" when they report such instances);
- Specifying material handling procedures and storage requirements; and
- Implementing spill response procedures.

7.2 Office manager

The BES Office Manager shall maintain training class schedules, records of all training classes, training materials used in classes, and other appropriate records that all current employees have been trained in spill prevention and response.

8.0 Training Schedule

Training classes shall be conducted on an annual basis, during the month of January of each year. Furthermore, each new employee hired will be instructed on spill prevention and response procedures prior to starting work in an industrial activity.

9.0 Outside Contractors

The BES General Manager will be responsible for instructing all outside contractors working at the facility about the facility's spill prevention and response procedures.

10.0 Related Procedures

- BES Procedure BES-SWPPP-004: Good Housekeeping
- BES Procedure BES-SWPPP-004a: Good Housekeeping - Operation & Maintenance
- BES Procedure BES-SWPPP-004b: Good Housekeeping - Material Storage Practices
- BES Procedure BES-SWPPP-004c: Good Housekeeping - Inventory Control
- BES Procedure BES-SWPPP-004d: Good Housekeeping - Employee Participation
- BES Procedure BES-SWPPP-007: Spill Prevention and Response
- BES Procedure BES-SWPPP-014: Used Oil Recycle

EMPLOYEE TRAINING:
GOOD HOUSEKEEPING
PROCEDURE NO. BES-SWPPP-016
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is define the good housekeeping employee training program that is incorporated in the Storm Water Pollution Prevention Plan.

2.0 Scope

All employees are to be trained in good housekeeping practices.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement, maintain, and regularly schedule good housekeeping employee training classes for all employees at the tire shredding facility.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.e Employee Training

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Employee Training - Good Housekeeping

7.1 General Manager

The BES General Manager is responsible for implementing, scheduling and conducting employee training classes pertaining to good housekeeping. Specifically, all employees, regardless of level, will be trained about the following measures:

- Required regular vacuuming and/or sweeping;
- Promptly clean up spilled materials to prevent polluted runoff;

- Identify places where brooms, vacuums, sorbents, foams, neutralizing agents, and other good housekeeping and spill response equipment are located;
- Display signs reminding employees of the importance and procedures of good housekeeping;
- Discuss updated procedures and report on the progress of practicing good housekeeping at every meeting;
- Provide instruction on securing drums and containers and frequently checking for leaks and spills;
- Outline a regular schedule for housekeeping activities to determine that the job is being done.

7.2 Office manager

The BES Office Manager shall maintain training class schedules, records of all training classes, training materials used in classes, and other appropriate records that all current employees have been trained in good housekeeping.

8.0 Training Schedule

Training classes shall be conducted on an annual basis, during the month of January of each year. Furthermore, each new employee hired will be instructed on good housekeeping procedures prior to starting work in an industrial activity.

9.0 Related Procedures

- BES Procedure BES-SWPPP-007: Spill Prevention and Response
- BES Procedure BES-SWPPP-004: Good Housekeeping
- BES Procedure BES-SWPPP-004a: Good Housekeeping - Operation & Maintenance
- BES Procedure BES-SWPPP-004b: Good Housekeeping - Material Storage Practices
- BES Procedure BES-SWPPP-004c: Good Housekeeping - Inventory Control
- BES Procedure BES-SWPPP-004d: Good Housekeeping - Employee Participation

EMPLOYEE TRAINING:
MATERIALS MANAGEMENT PRACTICES
PROCEDURE NO. BES-SWPPP-017
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is define the materials management practices employee training program that is incorporated in the Storm Water Pollution Prevention Plan.

2.0 Scope

All employees involved in industrial activity are to be trained in materials management practices.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement, maintain, and regularly schedule materials management practices employee training classes for all employees involved in industrial activity at the tire shredding facility.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.e Employee Training

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Employee Training - Materials Management Practices

7.1 General Manager

The BES General Manager is responsible for implementing, scheduling and conducting employee training classes pertaining to materials management practices. Specifically, all employees involved in industrial activity will be trained about the following measures:

- Neatly organize materials for storage;
- Identify all toxic and hazardous substances stored, handled, and produced onsite;
- Discuss handling materials for these materials

7.2 Office manager

The BES Office Manager shall maintain training class schedules, records of all training classes, training materials used in classes, and other appropriate records that all current employees have been trained in materials management practices.

8.0 Training Schedule

Training classes shall be conducted on an annual basis, during the month of January of each year. Furthermore, each new employee hired will be instructed on materials management practices and procedures prior to starting work in an industrial activity.

9.0 Related Procedures

- BES Procedure BES-SWPPP-007: Spill Prevention and Response
- BES Procedure BES-SWPPP-004: Good Housekeeping
- BES Procedure BES-SWPPP-004a: Good Housekeeping - Operation & Maintenance
- BES Procedure BES-SWPPP-004b: Good Housekeeping - Material Storage Practices
- BES Procedure BES-SWPPP-004c: Good Housekeeping - Inventory Control
- BES Procedure BES-SWPPP-004d: Good Housekeeping - Employee Participation
- BES Procedure BES-SWPPP-014: Used Oil Recycle

EMPLOYEE TRAINING:
EPCRA, SECTION 313 FACILITY REQUIREMENTS
PROCEDURE NO. BES-SWPPP-018
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is define the EPCRA, Section 313 facility requirements employee training program that is incorporated in the Storm Water Pollution Prevention Plan.

2.0 Scope

All employees and outside contract personnel are to be trained in EPCRA, Section 313 facility requirements.

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will implement, maintain, and regularly schedule EPCRA, Section 313 facility requirements employee training classes for all employees involved in industrial activity at the tire shredding facility, as well as all outside contractors working on-site.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.e Employee Training

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Employee Training - EPCRA, Section 313 Facility Requirements

7.1 General Manager

The BES General Manager is responsible for implementing, scheduling and conducting employee training classes pertaining to EPCRA, Section 313 facility requirements. Specifically, all employees involved, regardless of level, will be trained about the following measures:

- Preventive measures, including spill prevention and response and preventive maintenance;

- Pollution control laws and regulations;
- The facility's Storm Water Pollution Prevention Plan;
- Features and operations of the facility which are designed to minimize discharges of Section 313 water priority chemicals, particularly spill prevention procedures

7.2 Office manager

The BES Office Manager shall maintain training class schedules, records of all training classes, training materials used in classes, and other appropriate records that all current employees have been trained in EPCRA, Section 313 facility requirements.

8.0 Training Schedule

Training classes shall be conducted on an annual basis, during the month of January of each year. Furthermore, each new employee hired will be instructed on EPCRA, Section 313 facility requirements and procedures prior to starting work in an industrial activity.

9.0 Outside Contractors

The BES General Manager will be responsible for instructing all outside contractors, prior to their starting work on the facility, about the facility's EPCRA, Section 313 facility requirements.

10.0 Related Procedures

- BES Procedure BES-SWPPP-007: Spill Prevention and Response
- BES Procedure BES-SWPPP-004: Good Housekeeping
- BES Procedure BES-SWPPP-004a: Good Housekeeping - Operation & Maintenance
- BES Procedure BES-SWPPP-004b: Good Housekeeping - Material Storage Practices
- BES Procedure BES-SWPPP-004c: Good Housekeeping - Inventory Control
- BES Procedure BES-SWPPP-004d: Good Housekeeping - Employee Participation
- BES Procedure BES-SWPPP-014: Used Oil Recycle

BENSON ENVIRONMENTAL SERVICES OF LOUISIANA, INC

TIPS FOR A SUCCESSFUL TRAINING PROGRAM

Suggestions of training tools that can be included in training programs:

- Employee Handbooks
- Films and slide presentations
- Drills
- Routine employee meetings
- Bulletin Boards
- Suggestion Boxes
- Newsletters
- Environmental excellence awards or other employee incentive programs

Benson Environmental Services of Louisiana, Inc.
Storm Water Pollution Prevention Plan

SECTOR N COMPLIANCE

BENSON ENVIRONMENTAL SERVICES OF LOUISIANA, INC
Summary of Compliance with Sector N Provisions

Table 1

Sector N Provisions	Compliant	Existing Procedures and/or BMPs
6.N.3.1. Prohibition of Non-Storm Water Discharges	YES	N/A
6.N.4.1. Drainage Area Map	YES	Included in SWPPP
6.N.4.4.1. Inbound Recyclable Material Control	YES	BES-SWPPP-013
6.N.4.4.2. Outdoor Storage	YES	BES-SWPPP-004b BES-SWPPP-008 BES-SWPPP-009 BES-SWPPP-011
6.N.4.4.3. Indoor Storage and Material Processing	YES	BES-SWPPP-004a-d BES-SWPPP-005 BES-SWPPP-006 BES-SWPPP-007
6.N.4.4.4. Vehicle and Equipment Maintenance	YES	BES-SWPPP-004a-d BES-SWPPP-005 BES-SWPPP-006 BES-SWPPP-007 BES-SWPPP-009 BES-SWPPP-011

Table 2
Sector-Specific Numeric Effluent Limitations & Benchmark Monitoring

Parameter	Benchmark Monitoring Cutoff Concentration	Numeric Limitation
Chemical Oxygen Demand (COD)	120 mg/l	---
Total Suspended Solids (TSS)	100 mg/l	---
Total Recoverable Aluminum	0.75 mg/l	---
Total Recoverable Copper	0.0636 mg/l	---
Total Recoverable Iron	1.0 mg/l	---
Total Recoverable Lead	0.0816 mg/l	---
Total Recoverable Zinc	0.117 mg/l	---
Total Organic Carbon (TOC)	---	50.0 mg/l, daily max.
Oil & Grease	---	15.0 mg/l, daily max.

SWPPP MONITORING
PROCEDURE NO. BES-SWPPP-022
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose
The purpose of this section is define the storm water runoff monitoring requirements for the site-specific Storm Water Pollution Prevention Plan.

2.0 Scope
Entirety of the Storm Water Pollution Prevention Plan

3.0 Policy
Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will perform storm water monitoring per Part 5 and 6N of the Louisiana requirements for Multi-Sector General Permits.

4.0 Regulatory Requirement
The regulatory requirement for this section is defined under LADEQ MSGP Requirements.

Part 5. Monitoring Requirements and Numeric Limitations

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
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6.0 Revisions
Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 SWPPP Monitoring

7.1 General Manager
The BES General Manager is responsible for, and is the only person designated to make, all storm water quality and quantity monitoring per the schedule listed below:

- Quarterly Visual Monitoring and Documentation
  A visual examination of the storm water discharge must be made quarterly, during daylight hours (e.g., normal working hours), unless no storm event produces runoff at the Outfall during the quarter. All observations during the quarter, including no observations, must be documented and kept with the SWPPP. A visual examination must be made of the rainfall or snowmelt runoff within the first 30 minutes of the start of the runoff (or as soon thereafter as practical, but not to exceed 1 hour). The examination must document observation of color,

odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of storm water pollution. No analytical tests are required to be performed on the samples. Observations must be made on a storm event that is greater than 0.1 inches in magnitude and that occurs at least 72 hours from the previously measurable (i.e., greater than 0.1 inch rainfall) storm event.

- Samples are not required to be collected under adverse weather conditions where dangerous conditions exist (i.e., flood, high winds, electrical storms, etc.).

- Numeric limitations and Benchmark Monitoring

  - Monitoring Period: The monitoring year is May 1 to April30. Monitoring quarters are January 1 to March 31; April 1 to June 30; July 1 to September 30; and October 1 to December 31.
  - Benchmark sampling is to be conducted during Year 2 of the permit period. If samples are collected all four quarters during Year 2 of the permit period, and the average concentration was below the benchmark value, then no more sampling is required. Otherwise, benchmark sampling must also be conducted during Year 4 of the permit period.
  - A minimum of one grab sample must be collected from the discharge resulting from a storm event of at least 0.1 inch of precipitation provided that the interval from the preceding measurable storm event is at least 72 hours. The sample must be collected during the first 30 minutes of the discharge, or as soon thereafter as practical, but not to exceed 1 hour.
  - Samples must be collected from Outfall 001.

7.2 Office Manager

The BES Office Manager will be responsible of keeping records of the storm water inspection and sampling activities.

- Visual examination reports must be kept onsite with the SWPPP. The reports must include the examination date and time, examination personnel, the nature of the discharge (i.e., runoff or snowmelt), visual quality of the storm water discharge (including observations of color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of storm water pollution), and probable sources of any observed pollution. Visual reports are not to be submitted to LDEQ but are to be kept with the SWPPP. The following signed certification must accompany the visual reports maintained with the SWPPP:

  "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

- Benchmark monitoring results must be kept with the SWPPP. These results must be reported on a Discharge Monitoring Report (DMR) and are to be submitted to the LDEQ annually as a one year package by January 28 following the completion of the monitoring year. The report must also include the date and duration (in hours) of the storm event sampled, rainfall measurements or estimates (in inches) of the storm event that generated the sampled runoff,

the duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event, and an estimate of the total volume (in gallons) of the discharge sampled.

- DMRs are to be sent to the Enforcement Division of the Office of Environmental Compliance. These addresses are given below:

  Enforcement Division
  Office of Environmental Compliance
  Department of Environmental Quality
  P.O. Box 82215
  Baton Rouge, LA 70884-2215

8.0 Related Procedures

PERMITTEE NAME/ADDRESS
(Include Facility Name/Location if different)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM *(NPDES)*
DISCHARGE MONITORING REPORT *(DMR)*

NAME Benson Environmental Services of Louisiana, Inc.
ADDRESS P.O. Box 239
Sibley, Louisiana 71073
FACILITY Tire Shredding Facility
LOCATION Webster Parish

(2-16)	*(17-19)*
LA	001
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD							
	YEAR	MO	DAY		YEAR	MO	DAY
FROM	04	01	01	TO	04	03	31
	(20-21)	*(22-23)*	*(24-25)*		*(26-27)*	*(28-29)*	*(30-31)*

NOTE: Read Instructions before completing this form.

PARAMETER *(32-37)*		*(3 Card Only)* QUANTITY OR LOADING			*(4 Card Only)* QUALITY OR CONCENTRATION				NO. EX *(62-63)*	FREQUENCY OF ANALYSIS *(64-68)*	SAMPLE TYPE *(69-70)*
		(46-53) AVERAGE	*(54-61)* MAXIMUM	UNITS	*(38-45)* MINIMUM	*(46-53)* AVERAGE	*(54-61)* MAXIMUM	UNITS			
Chemical Oxygen Demand (COD)	SAMPLE MEASUREMENT						120	mg/l		1/3	GRAB
	PERMIT REQUIREMENT										
Total Suspended Solids (TSS)	SAMPLE MEASUREMENT						100	mg/l		1/3	GRAB
	PERMIT REQUIREMENT										
Total Recoverable Aluminum	SAMPLE MEASUREMENT						0.75	mg/l		1/3	GRAB
	PERMIT REQUIREMENT										
Total Recoverable Copper	SAMPLE MEASUREMENT						0.0636	mg/l		1/3	GRAB
	PERMIT REQUIREMENT										
Total Recoverable Iron	SAMPLE MEASUREMENT						1.0	mg/l		1/3	GRAB
	PERMIT REQUIREMENT										
Total Recoverable Lead	SAMPLE MEASUREMENT						0.0816	mg/l		1/3	GRAB
	PERMIT REQUIREMENT										
Total Recoverable Zinc	SAMPLE MEASUREMENT						0.117	mg/l		1/3	GRAB
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE		DATE		
Janice Nelson	I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.		318	371-6692			
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

PERMITTEE NAME/ADDRESS
(Include Facility Name/Location if different)

NAME Benson Environmental Services of Louisiana, Inc.
ADDRESS
P.O. Box 239
Sibley, Louisiana 71073
FACILITY Tire Shredding Facility
LOCATION Webster Parish

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM *(NPDES)*
DISCHARGE MONITORING REPORT *(DMR)*

(2-16)	*(17-19)*
LA	001
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD						
FROM	YEAR	MO	DAY	TO	YEAR	MO	DAY
	04	01	01		04	03	31
	(20-21)	*(22-23)*	*(24-25)*		*(26-27)*	*(28-29)*	*(30-31)*

NOTE: Read Instructions before completing this form.

PARAMETER *(32-37)*		*(3 Card Only)* QUANTITY OR LOADING			*(4 Card Only)* QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE *(46-53)*	MAXIMUM *(54-61)*	UNITS	MINIMUM *(38-45)*	AVERAGE *(46-53)*	MAXIMUM *(54-61)*	UNITS	*(62-63)*	*(64-68)*	*(69-70)*
Total Organic Carbon (TOC)	SAMPLE MEASUREMENT						50.0	mg/l		1/3	GRAB
	PERMIT REQUIREMENT										
Oil & Grease	SAMPLE MEASUREMENT						15.0	mg/l		1/3	GRAB
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Janice Nelson
TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
AREA CODE	NUMBER	YEAR	MO	DAY
318	371-6692			

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

BENSON ENVIRONMENTAL SERVICES OF LOUISIANA, INC.

ENDANGERED SPECIES SURVEY

Endangered species listed for Webster Parish:

- Bald Eagle (Haliaeetus leucocephalus)
- Arctic Peregrine Falcon (Falco peregrinus tundris)
- Red Cockaded Woodpecker (Picoides borealis)

Visual observations have confirmed that none of these species are found in the proximity to the facility property, nor in the immediate path of storm water runoff from the facility.

BENSON ENVIRONMENTAL SERVICES OF LOUISIANA, INC.

STATE HISTORICAL SITE SURVEY

There are no State Historical Sites located in Webster Parish.

Benson Environmental Services of Louisiana, Inc.
Storm Water Pollution Prevention Plan

EVALUATION AND MONITORING

ANNUAL COMPREHENSIVE SITE COMPLIANCE EVALUATION
PROCEDURE NO. BES-SWPPP-019
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose
The purpose of this section is define the annual comprehensive site compliance evaluation that is incorporated as part of the Storm Water Pollution Prevention Plan.

2.0 Scope
Entirety of the Storm Water Pollution Prevention Plan

3.0 Policy
Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will conduct annually a comprehensive site compliance evaluation.

4.0 Regulatory Requirement
The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.4. Comprehensive Site Compliance Evaluation

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions
Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Comprehensive Site Compliance Evaluation

7.1 General Manager
The BES General Manager is responsible for conducting the comprehensive site compliance evaluation on an annual basis. The process for conducting the evaluation will include the following steps:

- Review the Storm Water Pollution Plan and draw up a list of those items which are part of material handling, storage, and transfer areas covered by the plan.
- List all equipment and containment in these areas covered by the plan.

- Review facility operations for the past year to determine if any more areas should be included in the original plan, or if any existing areas were modified so as to require plan modification; Change plan as appropriate.
- Conduct inspection to determine: 1) if all storm water pollution prevention measures are accurately identified in the plan; and, 2) are in place and working properly.
- Document findings.
- Modify Storm Water Pollution Plan as appropriate.

7.2 Office manager

The BES Office Manager shall maintain all appropriate records and update the Storm Water Pollution Prevention Plan as required.

8.0 Related Procedures

- BES Annual Comprehensive Site Compliance Evaluation Checklist

BENSON ENVIRONMENTAL SERVICES OF LOUISIANA, INC.

ANNUAL COMPREHENSIVE SITE EVALUATION CHECKLIST

- ❑ Inspect storm water discharge areas for evidence of pollutants entering the drainage system.
- ❑ Evaluate the effectiveness of measures to reduce pollutant loadings and whether additional measures are needed.
- ❑ Observe structural measures, sediment controls, and other storm water BMPs to ensure proper operation.
- ❑ Inspect any equipment needed to implement the plan, such as spill response equipment.
- ❑ Revise the plan as needed within two (2) weeks of inspection (potential pollutant source description and description of measures and controls)
- ❑ Implement any necessary changes in a timely manner, but at least within twelve (12) weeks of the inspection.
- ❑ Prepare a report summarizing inspection results and follow up actions, the date of the inspection and personnel who conducted the inspection; identify any incidents of noncompliance or certify that the facility is in compliance with the plan.
- ❑ All incidents of noncompliance must be documented in the inspection report. Where there are no incidents of noncompliance, the inspection report must contain a certification that the facility is in compliance with the plan.
- ❑ Sign the report in accordance with the plan and keep the report with the plan.

SWPPP RECORD KEEPING
PROCEDURE NO. BES-SWPPP-020
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is define the individual responsible for keeping records and what records are to be kept as part of the Storm Water Pollution Prevention Plan.

2.0 Scope

Entirety of the Storm Water Pollution Prevention Plan

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will keep on-site all records as required.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.D.3.f. Record Keeping

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Keeping Records

7.1 Office Manager

The BES Office Manager is responsible for keeping all record in accordance with the Storm Water Pollution Prevention Plan. All records must be kept for at least one year after the permit expires. Records that will be kept include the following:

- Incidents such as spills or other discharges, along with other information describing the quality and quantity of storm water discharges.
  - Date and time of incident
  - Weather conditions
  - Duration
  - Cause
  - Environmental problems

- Parties notified
- Recommended revisions tothe BMP program, operating procedures, and/or equipment needed to prevent recurrence

- Inspections and maintenance activities must be documented and recorded in the plan.

- It is important to keep records updated on:
  - Correct name and address of facility
  - Correct name and location of receiving waters
  - The number and location of discharge points
  - Principal products and production rates.

8.0 Related Procedures

SWPPP REVISION
PROCEDURE NO. BES-SWPPP-021
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is define the individual responsible for revising the Storm Water Pollution Prevention Plan.

2.0 Scope

Entirety of the Storm Water Pollution Prevention Plan

3.0 Policy

Benson Environmental Services of Louisiana, Inc., in accordance with requirements for Storm Water Pollution Prevention Plans, will keep current the SWPPP.

4.0 Regulatory Requirement

The regulatory requirement for this section is defined under USEPA General Permit Requirements.

Part IV.C. Keeping Plans Current

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 SWPPP Revision

7.1 Office Manager

The BES Office Manager is responsible for keeping the SWPPP current. The SWPPP will be amended whenever there is a change in design, construction, operation, or maintenance, which may impact the potential for pollutants to be discharged or if the SWPPP proves to be ineffective in controlling the discharge of pollutants.

8.0 Related Procedures

CHAPTER 4

Site Closure Plan

CHAPTER 4
SITE CLOSURE PLAN

Policy
of
Benson Environmental Services of Louisiana, Inc.
Site Closure Plan

Policy. It is the goal of Benson Environmental Services of Louisiana, Inc. to develop, implement and maintain a Site Closure Plan, as defined by Title 33, Part VII, Subpart 2, §10517 A 16, that will protect human health and the environment.

Responsibilities. It is the responsibilities of the following personnel to enact and perform the duties required to accomplish this goal.

President of Benson Environmental Services of Louisiana, Inc. has final authority to ensure that the Site Closure Plan is implemented and maintained as required by law.

General Manager is responsible for the overall administration and operation of the Waste Tire Processing Facility. This responsibility includes maintaining all aspects of the Site Closure Plan.

This policy originally adopted on October 1, 2003.
This policy re-adopted on this day, March 1, 2008.

General Manager

SITE CLOSURE PLAN
PROCEDURE NO. BES-SCP-001
EFFECTIVE DATE: OCTOBER 1, 2003

1.0 Purpose

The purpose of this section is to define a Site Closure Plan, and the individuals responsible for executing a Site Closure Plan, that will assure clean closure of the BES property should the tire shredding facility cease operations.

2.0 Scope

Entirety of the Site Closure Plan

3.0 Policy

Benson Environmental Services of Louisiana, Inc., will maintain a site closure plan in accordance with the requirements of Title 33, Part VII, Subpart 2, §10517 A 16 that will protect human health and the environment.

4.0 Regulatory Requirement

Title 33, Part VII, Subpart 2, §10517 A 16

5.0 Definitions

BES	Benson Environmental Services of Louisiana, Inc.
BMPs	Best Management Practices
LDEQ	Louisiana Department of Environmental Quality
LPDES	Louisiana Pollutant Discharge Elimination System
MSGP	Multi-Sector General Permit
NPDES	National Pollutant Discharge Elimination System
SPCC	Spill Prevention, Control, and Countermeasure Plan
SWPPP	Storm Water Pollution Prevention Plan
USEPA	United States Environmental Protection Agency

6.0 Revisions

Revisions to this procedure have been made on the following dates:

1st) October 1, 2003
2nd) March 1, 2008

7.0 Site Closure Plan

The purpose of the site closure plan is to assure clean closure of the BES site in the event that the tire shredding facility ceases operation. BES will maintain on file a list of third-party contractors who have the equipment and expertise available to clean and close the site, and return the site to its original condition. The steps involved in the site closure will include, but not necessarily be limited to, removing all waste tires and waste tire materials from the site, removing all buildings, and grading the site and returning it to its original state. BES will maintain on file a current cost estimate for hiring a responsible third-party contractor to close the facility at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive.

BES shall maintain a site closure financial assurance fund in an amount based on the maximum number of pounds of waste tire material that will be stored on the site at any one time. This fund

shall be in the form of a financial guarantee bond, performance bond, or an irrevocable letter of credit in the amount of $20 per ton of waste tire material on the site.

7.1 General Manager

The BES General Manager is responsible for keeping all aspects of the site closure plan current, including, reviewing the financial assurance at least annually.

8.0 Related Procedures

APPENDIX A

Written Notification that Site may be used for a Tire Shredding Facility

Webster Parish Police Jury

September 16, 2003

Benson Environmental Services, Inc.
Attn: Mr. J. A. Benson
P. O. Box 180
Princeton, LA 71067

Re: Lease Agreement

Dear Mr. Benson:

In reference to our letter of August 12, 2003 concerning the lease agreement between Benson Environmental Services, Inc. and Webster Parish Police Jury, I refer you to Section 1 (Terms) of the Lease. The initial lease will expire on December 9, 2006. You have the option of renewing this lease under identical terms and conditions for an additional ten (10) year period, that lease expiring on December 9, 2016. Monthly rental fees will begin on December 6, 2006 in the amount of $500.00.

If further information is needed, please let us know.

Sincerely,

WEBSTER PARISH POLICE JURY

Charles R. Walker
President

P.O. Box 389 Minden, Louisiana 71058-0389
Phone: (318) 377-7564 Fax: (318) 371-2356

Webster Parish Police Jury

July 8, 1996

Benson Construction
Attn: Mr. Luke Turner
P.O. Box 180
Princeton, LA 71067

RE: Waste Tire Processing Facility

Dear Mr. Turner:

The Webster Parish Police Jury voted in a Building and Grounds Committee Meeting, June 27, 1996 the following:

To swap 30 acres of land at the Webster Parish Penal Farm (adjacent to SWID property), with a lease of 10 years for the 80 acres Benson Construction has already purchased off parish road # 111. The 80 acres will be used by the parish for iron ore. The 30 acres of land must be used for a tire shredding facility, if not the Jury will regain possession and if the business fails, the Jury will regain possession. The company must follow DEQ and any other state agency guidelines.

The above minutes were approved by the full Jury on July 2, 1996 in Regular session.

If you have any questions, please contact my office.

Sincerely,

WEBSTER PARISH POLICE JURY

Shirley R Byrd

Shirley R. Byrd
Secretary-Treasurer

SRB/rc

P.O. Box 389
Minden, Louisiana 71058-0389 Phone: (318) 377-7564

APPENDIX B

Local Zoning/Permitting Compliance

Webster Parish Police Jury

February 12, 2008

Benson Environmental Service, Inc.
Attn: Brian Benson
P.O. Box 239
Sibley, LA 71073

RE: Zoning

Dear Mr. Benson:

There are no zoning ordinances outside the municipalities of Webster Parish. (Exception: Webster Parish Police Jury Ordinance # 0975- Enacting Chapter 22 of the Webster Parish Code of Ordinances to provide for the Licensing and Regulation of Sexually Oriented Businesses and Employees.) Since your business does not fall into the category of the exception, and your business is located outside of a Webster Parish municipality, it is not in violation of any zoning ordinances of Webster Parish.

If you need additional information, please give me a call.

Sincerely,

Ronda C. Carnahan

Ronda C. Carnahan
Secretary-Treasurer

RCC

File: Zoning

P.O. Box 389 Minden, Louisiana 71058-0389
Phone: (318) 377-7564 Fax: (318) 371-2366

BENSON ENVIRONMENTAL SERVICE, INC.

Preserving and Protecting our Environment

February 4, 2008

To: Webster Parish Police Jury
P.O. Box 389
Minden, LA 71055

From: Brian Benson
Benson Environmental Services
P.O. Box 239
Sibley, LA 71073

Dear Sir or Madam,

Per Louisiana Department of Environmental Quality rules and regulations Benson Environmental Services is required to provide "*10. written documentation from the appropriate local governing authority, stating that the facility is in compliance with local zoning and permitting requirements.*"

To this end I am writing to inquire if Benson Environmental is currently in compliance with local zoning law and if so, to ask that we be notified in writing that we are in compliance with local zoning laws.

Sincerely,

Brian Benson
Benson Environmental Services.

P.O. Box 239 • Sibley, La 71073 • Office (318) 371-6692 • Fax (318) 377-9100

APPENDIX C

Property Owner Approval of Property Use

Webster Parish Police Jury

September 16, 2003

Benson Environmental Services, Inc.
Attn: Mr. J. A. Benson
P. O. Box 180
Princeton, LA 71067

Re: Lease Agreement

Dear Mr. Benson:

In reference to our letter of August 12, 2003 concerning the lease agreement between Benson Environmental Services, Inc. and Webster Parish Police Jury, I refer you to Section 1 (Terms) of the Lease. The initial lease will expire on December 9, 2006. You have the option of renewing this lease under identical terms and conditions for an additional ten (10) year period, that lease expiring on December 9, 2016. Monthly rental fees will begin on December 6, 2006 in the amount of $500.00.

If further information is needed, please let us know.

Sincerely,

WEBSTER PARISH POLICE JURY

Charles R. Walker

Charles R. Walker
President

P.O. Box 389 Minden, Louisiana 71058-0389
Phone: (318) 377-7564 Fax: (318) 371-2366

Webster Parish Police Jury

July 8, 1996

Benson Construction
Attn: Mr. Luke Turner
P.O. Box 180
Princeton, LA 71067

RE: Waste Tire Processing Facility

Dear Mr. Turner:

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The above minutes were approved by the full Jury on July 2, 1996 in Regular session.

If you have any questions, please contact my office.

Sincerely,

WEBSTER PARISH POLICE JURY

Shirley R Byrd

Shirley R. Byrd
Secretary-Treasurer

SRB/rc

P.O. Box 389
Minden, Louisiana 71058-0389 Phone: (318) 377-7564

TATE OF LOUISIANA

rish of Webster

IT KNOWN, That this day before me, P.L.Rathbun

tary Public in and for the said Parish, duly commissioned and sworn, came and appeared
hos.Crichton Jr,Trustee for the estate of his deceased father Thos.:-
richton Sr, and Agent for the widow and hairs, Mrs Kate Jackson Crichton;
rs. Kate Crichton Gredlar; Raval Crichton and himself personally

o declared that he do OS by these presents GRANT, BARGAIN, SELL,
NVEY AND DELIVER, with full guarantee of title, and with complete transfer and subrogation of all
hts and actions of warranty against all former proprietors of the property herein conveyed unto
rish of Webster, J.H.Nolson,President of Police Jury, authorized by that
dy accepting same.

following described property, to-wit: Southeast Quarter of Section 10 and Southwest
uarter and all that part of the North-half of Southeast Qr, lying west of
nden and Dubberly Road and eleven acres described as beginning at South-
st corner of Southwest Qr, of Northeast Qr, and run North Three Hundred-
ght (308) feet; thence East to Minden & Dubberly Road; thence Southeast
long said road to line dividing Northeast Quarter from Southeast Qr;
nce West along said line to point of beginning, all in Section 11,
ownship 18, Range (9),containing Four Hundred Ten (410) acres more or
ss with all improvements thereon, but the right to remove crops growing
n the land is reserved by vendors who shall pay the taxes assessed for the
resent year

TO HAVE AND TO HOLD said described property unto said purchaser, their successors heirs and assigns forever.

This sale is made for the consideration of the sum of Ten Thousand Two Hundred Fifty & No/100... Dollars, payable as follows:

Twelve Hundred Fifty & No/100.................................. Dollars cash in hand paid, the receipt of which is hereby acknowledged, and the balance in nine annual

xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

installments, represented by nine notes for $1.000 each of this date, payable to the order of Thos. Crichton Jr, Trustee, which notes bear six (6%) per annum interest from date, interest on all of the notes to be paid annually, all of the notes to become due on failure to pay any note at its maturity or interest as herein specified.

xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

Paraphed "Ne Varietur" of this date by me, Notary, to identify the same herewith.

In the event of suit for collection of said notes said purchaser shall pay all costs of same, including ten per cent, attorney's fees, on amount sued for. And in order to secure the payment of said notes, interest and costs, including attorney's fees, a special mortgage and vendor's privilege is hereby stipulated on said property in favor of said vendor, or any future holder of said notes, said purchaser agreeing not to alienate, deteriorate or encumber said property to the prejudice of the mortgage.

This mortgage waiving benefit of appraisement and importing confession of judgment.

The certificate of mortgage is hereby waived by the parties, and evidence of the payment of taxes produced.

DONE AND PASSED at my office in said Parish of Webster in presence of [signature] and [signature] competent witnesses, on this the 19th, day of October A. D. Nineteen Hundred and 28

ATTEST:

[signature] [signature]

[signature] [signature]

[signature]

WINIFRED B. BRINKLEY
CLERK OF COURT
WEBSTER PARISH, LA

97 AUG 22 PM 3:45

DEPUTY CLERK

REGISTRY NO.
ACT OF TRANSFER
413352

STATE OF LOUISIANA
PARISH OF WEBSTER

BEFORE US, the undersigned Notary Public and witnesses, personally came and appeared:

BENSON ENVIRONMENTAL SERVICE, INC., a Louisiana corporation, with a permanent mailing address of P. O. Box 180, Princeton, LA 71067, represented herein by its president, J.A. Benson, (VENDOR);

who declared that it does, by these presents, GRANT, BARGAIN, SELL, CONVEY AND DELIVER, with full guarantee of title, and with complete transfer and subrogation of all rights and actions of warranty against all former proprietors herein conveyed, together with all rights of prescription, whether acquisitive or liberative, to which VENDOR may be entitled, unto:

WEBSTER PARISH POLICE JURY, a Political Subdivision of the State of Louisiana, with a permanent mailing address of P O Box 389, Minden, LA 71058-0389, represented herein by its President, John M. Blake, (VENDEE);

the following described property:

An 83.75 acres, more or less, tract of land situated in the Northeast Quarter of the Northwest Quarter, the Northwest Quarter of the Northwest Quarter, and the Southwest Quarter of the Northwest Quarter, Section 32, Township 20 North, Range 8 West, Webster Parish, Louisiana, being more particularly described as follows:

Begin at the Northeast corner of the Northeast Quarter of the Northwest Quarter (NW|4 of NW\4), Section 32, Township 20 North, Range 8 West, Webster Parish, Louisiana, for the point of beginning; thence run South 1 degree 38 minutes 43 seconds East along a fence 1407.06 feet; thence run South 88 degrees 43 minutes 28 seconds West along a fence 643.67 feet; thence run North 89 degrees 42 minutes 49 seconds West 700.61 feet, thence run South 1 degree 17 minutes 45 seconds East 932.71 feet; thence run South 1 degree 03 minutes 49 seconds West along a fence 427.83 feet; thence run North 88 degrees 30 minutes 34 seconds West 1312.11 feet; thence run North 1 degree 07 minutes 29 seconds West 930.20 feet; thence run North 89 degrees 30 minutes 07 seconds East 810.85 feet; thence run North 0 degrees 71 minutes 06 seconds West 1155.14 feet to the center line of Webster Parish Road #111; thence run North 54 degrees 01 minutes East along the center line of said road 107.50 feet; thence run South 4 degrees 45 minutes 10 seconds East 128.76 feet; thence run North 89 degrees 10 minutes 42 seconds East 410.66 feet; thence run North 0 degrees 23 minutes 56 seconds West 463.07 feet to the North side of Webster Pariah Road #111; thence run North 56 degrees 45 minutes East along the North side of said

[illegible] acres, more or less. [illegible]

TO HAVE AND TO HOLD said described property unto said

VENDEE, its heirs and assigns forever.

THIS SALE is made for the consideration of and as an integral part of a lease agreement entered into by VENDOR and VENDEE in which immovable property owned by VENDEE is leased unto VENDOR, a copy of said lease is attached hereto as Exhibit "A". The title to the property herein conveyed immediately vests full ownership in the Webster Parish Police Jury and shall not be set aside for any reason whatsoever.

The Certificate of Mortgage is hereby waived by the parties and evidence of payment of all past due and/or current year's taxes produced. VENDEE takes cognizance of all past due and/or current year's taxes and agrees to pay the same.

VENDEE hereby acknowledges and recognizes that this sale is made subject to any and all reservations of mineral interests and/or lease of mineral interest which are of record in the Office of the Webster Parish Clerk of Court. Further, VENDEE has examined a copy of the Plat of Survey for the property, dated May 31, 1996, by Wayne B. Williamson, Land Surveyor, and relieves and releases VENDOR from any and all claims for any vices or defects in said property reflected in said survey.

SIGNED before the undersigned Notary and witnesses, in Minden, Webster Parish, Louisiana, this 9th day of December, 1996.

WITNESSES:

BENSON ENVIRONMENTAL SERVICE, INC.

By:

Notary Public

SIGNED before the undersigned Notary and witnesses, in Minden, Webster Parish, Louisiana, on the 9th day of December, 1996.

WITNESSES:

WEBSTER PARISH POLICE JURY

By:

REGISTRY NO.

413353

MINFRED D. BRINKLEY
CLERK OF COURT
WEBSTER PARISH, LA

97 AUG 22 PM 3:46

DEPUTY CLERK

LEASE AGREEMENT

STATE OF LOUISIANA
PARISH OF WEBSTER

BEFORE US, the undersigned Notary Public and witnesses, personally came and appeared:

WEBSTER PARISH POLICE JURY, a Political Subdivision of the State of Louisiana, with a permanent mailing address of P O Box 389, Minden, LA 71058-0389, represented herein by its President, John M. Blake, (OWNER);

who declared that it does hereby lease unto:

BENSON ENVIRONMENTAL SERVICE, INC., a Louisiana corporation, with a permanent mailing address of P. O. Box 180, Princeton, LA 71067, represented herein by its president, J. A. Benson, (TENANT);

who accepts this lease of the following described property:

Begin at the Southwest corner of the Southeast Quarter, Section 10, Township 19 North, Range 8 West, Webster Parish, Louisiana, and run North 2 degrees 21 minutes 50 seconds East 198.6 feet; thence run South 89 degrees 47 minutes East 60 feet for the point of beginning; thence run North 2 degrees 21 minutes 50 seconds East 1045 feet; thence run South 89 degrees 47 minutes 1252 feet, thence run South 2 degrees 21 minutes 50 seconds West 1045 feet; thence run North 89 degrees 47 minutes West 1252 feet to the point of beinning, containing 30.00 acres, more or less.

under the following terms and conditions:

1-TERM

This lease shall be for a term of ten (10) years, beginning on December 9, 1996, and ending on December 9, 2006. Benson Environment will have a ten-year paid up lease for the thirty (30) acres of Penal Farm property in exchange for the eighty (80) acres of land off the Dogwood Trail property (Road No. 111) described as follows:

An 82.75 acres, more or less, tract of land situated in the Northeast Quarter of the Northwest Quarter, the Northwest Quarter of the Northwest Quarter, and the Southwest Quarter of the Northwest Quarter, Section 32, Township 20 North, Range 8 West, Webster Parish, Louisiana, being more particularly described as follows:

Begin at the Northeast corner of the Northeast Quarter of the Northwest Quarter (NW¼ of NW¼), Section 32, Township 20 North, Range 8 West, Webster Parish, Louisiana, for the point of beginning; thence run South 1 degree 38 minutes 43 seconds East along a fence 1407.06 feet; thence run South 88 degrees 43 minutes 28 seconds West along a fence 643.67 feet; thence run North 89 degrees 42 minutes 42 seconds West [illegible]

[illegible] along a fence 427.83 feet; thence run North 88 degrees 30 minutes 34 seconds West 1312.11 feet; thence run North 1 degree 07 minutes 29 seconds West 930.20 feet; thence run North 89 degrees 30 minutes 07 seconds East 810.85 feet; thence run North 0 degrees 71 minutes 06 seconds West 1155.14 feet to the center line of Webster Parish Road #111; thence run North 54 degrees 01 minutes East along the center line of said road 107.50 feet; thence run South 4 degrees 45 minutes 10 seconds East 128.76 feet; thence run North 89 degrees 10 minutes 42 seconds East 410.66 feet; thence run North 0 degrees 23 minutes 56 seconds West 463.07 feet to the North side of Webster Parish Road #111; thence run North 56 degrees 45 minutes East along the North side of said road 440.42 feet; thence run North 89 degrees 10 minutes 42 seconds East 943.59 feet to the point of beginning.

Further TENANT may renew this lease agreement under identical terms and conditions for an additional ten (10) year period by giving OWNER written notice at least thirty (30) days in advance of the first day of the month on which this lease agreement is to terminate. Finally TENANT may cancel this lease at any time upon giving OWNER written notice sixty (60) days in advance of the first day of the month the cancellation is to occur.

2-RENTAL FEE

The monthly rental during the term of this lease shall be $500.00 payable on the first day of each month, beginning December 10, 2006. As additional consideration for entry into this lease agreement, TENANT simultaneously herewith shall convey unto OWNER, approximately 80 acres of immovable property located on Highway 111, Webster Parish, Louisiana.

3-UTILITIES

All utilities to the leased properties shall be in TENANT's name and TENANT shall pay for all utilities used on the leased premises.

4-INSURANCE

TENANT shall maintain public liability insurance (naming OWNER as an additional insured) in an amount of not less than $1,000,000.00.

5-NOTICES TO OWNERS

All notices to OWNER under the terms of this lease agreement shall be sent to:

Webster Parish Police Jury

P.O. Box 389

Minden, LA 71058-0389

6-NOTICES TO TENANT

All notices to TENANT under the terms of this lease agreement shall be sent to:

Benson Environmental Service, Inc.

P.O. Box 180

7-USE OF LEASED PROPERTY

TENANT has advised OWNER that is intends to use the premises for recycling activities and/or other lawful commercial uses. TENANT shall comply in every respect at TENANT's expense with the rules and regulations of the Department of Environmental Quality, or those of any similar bureau or association. Further, TENANT shall not at any time use or permit the use of the leased property or any portion thereof for any illegal or unlawful purposes.

8-ACCELERATION OF RENTS

In the event either party defaults under the terms of this lease agreement and the other party places this lease agreement in the hands of an attorney for enforcements, cancellation or collection, the defaulting party agrees to pay in addition to rentals and actual damages due, reasonable attorney's fees made necessary by its breach. In the event TENANT fails to pay any one month's rental, then all of the unmatured rent shall become due, at the option of OWNER.

9-BANKRUPTCY OF TENANT

In the event an order for relief is entered with respect to TENANT by any Bankruptcy Court, OWNER shall have the option to either (a) terminate the lease of (b) accelerate all of the payments due under the remaining terms of the lease.

10-LEASE

TENANT acknowledges that it has inspected the premises and accepts full responsibility for any and all environmental problems, if any, exists and agrees to hold the OWNER free and clear of any and all responsibility in connection with the said environmental problems if the same exists.

Upon termination of the lease for any cause, TENANT shall return the said property to the OWNER free and clear of any environmental problems or make restitution to the OWNER forthwith for the cost of removing any environmental problems.

SIGNED before the undersigned Notary and witnesses, in Minden, Webster Parish, Louisiana, this 9th day of December, 1996.

WITNESSES:

WEBSTER PARISH POLICE JURY

By: John M. Blake, Jr.

Notary Public

SIGNED before the undersigned Notary and witnesses, in Minden, Webster Parish, Louisiana, on the 9th day of December, 1996.

WITNESSES:

BENSON ENVIRONMENTAL SERVICE, INC.

By:

Notary Public

Webster Parish Police Jury

August 12, 2003

Benson Environmental Service, Inc.
Attn: Mr. J. A. Benson
P.O. Box 180
Princeton, LA 71067

RE: Lease Agreement

Dear Mr. Benson:

The Webster Parish Police Jury will agree to allow Benson Environmental Services, Inc. to extend the current 10 year lease for the 30 acres of Penal Farm property. The current lease will expire on December 9, 2006 and rental in the amount of $500.00 will be paid on the first of each month to the Webster Parish Police Jury beginning December 10, 2006.

If you have any questions concerning this, please contact my office or you may call Mr. Charles Odom at 318-377-6334. Thank you for your consideration in this matter.

Sincerely,

Charles Walker

Charles Walker
President

P.O. Box 389 Minden, Louisiana 71058-0389
Phone: (318) 377-7564 Fax: (318) 371-2366

APPENDIX D

Proof of Publication of Notice of Intent to Submit an application for a Standard Tire Permit

CAPITAL CITY PRESS

Publisher of
THE ADVOCATE

PROOF OF PUBLICATION

The hereto attached notice was
published in THE ADVOCATE,
a daily newspaper of general circulation
published in Baton Rouge, Louisiana,
and the official Journal
of the State of Louisiana,
the City of Baton Rouge,
and the Parish of East Baton Rouge,
in the following issues:

01/16/08

Susan A. Bush, Public Notices Clerk

Sworn and subscribed before me by the
person whose signature appears above:

January 16, 2008

Pegeen Singley, Notary Public, #66565
My Commission Expires: Indefinite
Baton Rouge, Louisiana

Public Notice

Notice is hereby given that Benson Environmental Services does intend to submit to the Department of Environmental Quality, Office of Environmental Services Permits Division an application for a permit renewal to continue the operation of a waste tire processing facility in Webster Parish, southeast of Minden Range 9, West Township 18N, Section 10 off of Penal Farm Road. Comments concerning the facility may be filed with the Secretary of Louisiana Department of Environmental Quality at the following address:

Louisiana Department
of Environmental Quality
Office of Environmental Services
Permits Division
Waster Permit Section
PO BOX 4313
Baton Rouge, Louisiana
70821-4313

3799394-jan 16-1t

BENSON ENVIRONMENTAL 3799394
BRIAN BENSON
PO BOX 239
SIBLEY LA 71076

MINDEN PRESS-HERALD

STATE OF LOUISIANA

PARISH OF WEBSTER

BEFORE ME, the undersigned authority, Nita P. Johnson deposes and says:

That he/she is the President of the Minden Press-Herald, a daily newspaper published in the City of Minden, Parish of Webster, Louisiana, and that the attached Notice was duly published in the said newspaper of the following dates:

Benson Environmental Services Public Notice of permit renewal published on January 16, 2008

Sworn to and subscribed before me this 16 day of January, 2008

Nita P. Johnson

Nita P. Johnson, President

Carol C. Andrews

Carol C. Andrews, Notary Public, #061483

203 Gleason St. • Minden, LA 71055 • 318/ 377-1866 fax: 318/ 377-1895

www. press-herald.com

Mobile Homes

1998 16x80 3BR/2BA Central A/H. Located in Haynesville. $16,000 Call 318-664-3091.

Cars

2004 Lincoln Towncar Signature. 42,000 miles. Asking $19,000. 843-9101.

PUBLIC NOTICES
YOUR RIGHT TO KNOW

Public Notice

Notice is hereby given that Benson Environmental Services does intend to submit to the Department of Environmental Quality, Office of Environmental Services Permits Division an application for a permit renewal to continue the operation of a waste tire processing facility in Webster Parish, southeast of Minden Range 9, West Township 18N, Section 10 off Penal Farm Road. Comments concerning the facility may be filed with the Secretary of Louisiana Department of Environmental Quality at the following address: Louisiana Department of Environmental Quality Office of Environmental Services Permits Division Waster Permit Section PO BOX 4313 Baton Rouge, Louisiana 70821-4313

January 16, 2008
Minden Press-Herald

The Sibley Town Council met in regular session on Tuesday, January 8, 2008 at 6:00pm in the Sibley Town Hall Council Chambers. Members present

update of
Funds ar
Mid-Winte
Conferen
Meeting A
Larry Mer
Attest
Sherri Mc
Town Cler
January 1
Minden Pr

Pre-employm

APPENDIX E

Letter of Compliance and Certification of Premises and Buildings
from the State Fire Marshal

DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS

Public Safety Services

[redacted]OSTER, JR.
[redacted]R

V. J. BELLA
STATE FIRE MARSHAL

August 5, 1996

Luke Turner
BENSON ENVIRONMENTAL SERVICE, INC.
P. O. Box 180
Princeton, LA 71067

RE: Tire Recycling
Chrichton Road
Minden, LA

Dear Mr. Turner:

I am in receipt of your letter of July 8, 1996 in which you have documented your intent to establish an open air tire recycling/shredding facility on a 30 acre site southeast of Minden off the Chrichton Road on property leased from the Webster Parish Police Jury. You have documented that you will be shredding old automobile tires. Once shredded, it will be put into piles measuring 20' wide, 10' high and 200' in length. You have requested that this office render an opinion regarding this operation.

As you may or may not be aware, this office has jurisdiction over the design and construction of structures, watercrafts and movables. Based on the limits of our authority, it appears that this office does not [redacted]ve specific jurisdiction regarding tire recycling/shredding [redacted]ilities unless conducted within a building. You have documented [redacted]at your facility will be an open air recycling facility. Therefore, be advised that this office does not have statutory authority to govern your operations. However, you have requested an opinion of this office. Be advised that, if this office had jurisdiction, we would require specific compliance with NFPA 231D, Appendix C, which are the guidelines for outdoor storage of scrap tire. Table C-4.2.3 identifies representative exposure separation distances that, in our opinion, should be followed. While this office cannot make it mandatory, we would recommend specific compliance with all of the recommendations found in Appendix C of NFPA 231D.

Any buildings constructed or moved onto the site must be submitted to this office for formal review pursuant to LRS 40:1574A.

If you should have further questions, please feel free to contact this office.

Sincerely,

V. J. Bella

V. J. Bella
State Fire Marshal

VJB/JWJ/adg

benson

BENSON ENVIRONMENTAL SERVICE, INC.

Preserving and Protecting our Environment

July 8, 1996

State Fire Marshall
5150 Florida Blvd.
Baton Rouge, LA 70806

To Whom It May Concern,

We are in the process of obtaining a permit from the Department of Environmental Quality to recycle old tires on an 30 acre site SE of Minden off of the Chrichton Rd on property leased from the Webster Parish Police Jury. The coordinates are as follows: Section 10 Township 18 Range 9W.

We will be shredding old automobile tires. Once shredded they will be put into piles measuring 20' wide, 10' high, and 200' in length. They will remain on the property until shipped to a recycling plant. The piles will be divided by a 50' space which will be kept free of vegetation.

We will have an adequate water supply on site for any emergency that may arise. There will be no other type of processing done at this site.

We will be regulated by the Department of Environmental Quality.

I will contact you when the equipment is in place and invite you to make a courtesy inspection.

Sincerely,

Luke Turner

P.O. Box 180 • Princeton, La 71067 • Office (318) 949-9898 • Fax (318) 949-9797

APPENDIX F

Evidence of General Liability Insurance

INSURANCE BINDER

OP ID JN | DATE (MM/DD/YYYY) 01/31/2008

THIS BINDER IS A TEMPORARY INSURANCE CONTRACT, SUBJECT TO THE CONDITIONS SHOWN ON THE REVERSE SIDE OF THIS FORM.

AGENCY
[redacted]ller Woodard-Walker Agency
[redacted]06 Main Street
P.O. Box 817
Minden LA 71058-0817
Thomas A. Walker
PHONE (A/C, No, Ext): 318-377-9300 | FAX (A/C, No): 318-371-2726
CODE: | SUB CODE:
AGENCY CUSTOMER ID: BENSO-1

COMPANY: First Financial Ins. Co. | BINDER # 1215

EFFECTIVE DATE	EFFECTIVE TIME		EXPIRATION DATE	EXPIRATION TIME	
01/29/08	12:01	X AM / PM	02/29/08	X 12:01 AM / NOON	

X THIS BINDER IS ISSUED TO EXTEND COVERAGE IN THE ABOVE NAMED COMPANY PER EXPIRING POLICY #: 143FW02569

INSURED
Benson Environmental Services
P. O. Box 239
Sibley LA 71073

DESCRIPTION OF OPERATIONS/VEHICLES/PROPERTY (Including Location)
Rubber Reclaiming

COVERAGES

TYPE OF INSURANCE	COVERAGE/FORMS	DEDUCTIBLE	COINS %	LIMITS AMOUNT
PROPERTY — CAUSES OF LOSS: BASIC / BROAD / SPEC				
GENERAL LIABILITY				
X COMMERCIAL GENERAL LIABILITY			EACH OCCURRENCE	$1,000,000
CLAIMS MADE / X OCCUR			DAMAGE TO RENTED PREMISES	$100,000
			MED EXP (Any one person)	$5,000
			PERSONAL & ADV INJURY	$1,000,000
			GENERAL AGGREGATE	$2,000,000
	RETRO DATE FOR CLAIMS MADE:		PRODUCTS - COMP/OP AGG	$2,000,000
AUTOMOBILE LIABILITY			COMBINED SINGLE LIMIT	$
ANY AUTO			BODILY INJURY (Per person)	$
ALL OWNED AUTOS			BODILY INJURY (Per accident)	$
SCHEDULED AUTOS			PROPERTY DAMAGE	$
HIRED AUTOS			MEDICAL PAYMENTS	$
NON-OWNED AUTOS			PERSONAL INJURY PROT	$
			UNINSURED MOTORIST	$
				$
AUTO PHYSICAL DAMAGE — DEDUCTIBLE	ALL VEHICLES / SCHEDULED VEHICLES		ACTUAL CASH VALUE	
COLLISION:			STATED AMOUNT	$
OTHER THAN COL:			OTHER	
GARAGE LIABILITY			AUTO ONLY - EA ACCIDENT	$
ANY AUTO			OTHER THAN AUTO ONLY:	
			EACH ACCIDENT	$
			AGGREGATE	$
EXCESS LIABILITY			EACH OCCURRENCE	$
UMBRELLA FORM			AGGREGATE	$
OTHER THAN UMBRELLA FORM	RETRO DATE FOR CLAIMS MADE:		SELF-INSURED RETENTION	$
			WC STATUTORY LIMITS	
WORKER'S COMPENSATION AND EMPLOYER'S LIABILITY			E.L. EACH ACCIDENT	$
			E.L. DISEASE - EA EMPLOYEE	$
			E.L. DISEASE - POLICY LIMIT	$
SPECIAL CONDITIONS/ OTHER COVERAGES			FEES	$
			TAXES	$
			ESTIMATED TOTAL PREMIUM	$

NAME & ADDRESS

LAPURCH
La. Division of Administration
Capitol Station
P.O.Box 94095
Baton Rouge LA 70804-9095

MORTGAGEE | X ADDITIONAL INSURED
LOSS PAYEE

LOAN #

AUTHORIZED REPRESENTATIVE
Jeanette K. Nettles

APPENDIX G

Third Party Cost Estimate for Closure of Facility

Peterson Contracting
320 Dennis Drive
Minden, Louisiana
(318) 377-2255

June 4, 2003

Benson Environmental Services of La., Inc.
ATTN: Sandy Bryan
P. O. Box 239
Sibley, Louisiana 71073

RE: Clean-up and Closure of Facility

Dear Sandy:

Peterson Contracting presents a bid to clear and clean the tire processing facility, located at 326 Crichton Road, Sibley, Louisiana, of all whole tires and shredded tire material and return the property to the original condition for no less than $20.00 per ton. If Peterson Contracting elected to accept the job, it is with the understanding that there will not be more than 360,000 tires on this property. The whole tires will be taken to a permitted waste tire processor and the shredded tire material will be taken to a permitted landfill.

Sincerely,

David Peterson

BENSON CONSTRUCTION CO., INC.

P O BOX 400
PRINCETON, LA 71067

PHONE: 318-949-9898
FAX: 318-949-9797

June 3, 2003

Mr. Sandy Bryan
Benson Environmental
P O Box 239
Sibley, Louisiana, 71073

RE: Tire Shredding Facility
Clean-up

Dear Mr. Bryan:

Benson Construction Co., Inc., proposes to clear the property of all shredded and whole tires and return it to the original condition for the price of $20.00 per ton. We propose to haul all shreds to a permitted landfill and all whole tires to a permitted processor.

Sincerely,

J. A. Benson
President

APPENDIX H

Site Closure Financial Assurance Fund

DETAIL LISTING OF INCOME ASSETS

TOTAL INCOME ASSETS	**0.00** **0.00**		**0.00** **0.00**	**0.00**

DETAIL LISTING OF PRINCIPAL ASSETS

DESCRIPTION	TICKER	SHARES	MARKET VALUE/ TAX COST	MARKET PRICE/ COST PRICE	EST ANNUAL INCOME/ ACCRUED INC	CURRENT YIELD
MISCELLANEOUS						
SMY007950 $100,000 WASTE TIRE FACILITY IRREVOCABLE LETTER OF CREDIT #187 FROM CITIZENS NATIONAL BANK OF		1.000	1.00 1.00	1.00		
TOTAL MISCELLANEOUS			**1.00** **1.00**		**0.00** **0.00**	**0.00**
TOTAL PRINCIPAL ASSETS			**1.00** **1.00**		**0.00** **0.00**	**0.00**

SECURITIES OBTAINED THROUGH REGIONS BANK ARE NOT OBLIGATIONS OR DEPOSITS OF, NOR GUARANTEED BY REGIONS BANK, OR ANY OTHER BANK, NOR ARE THEY INSURED BY THE FDIC. SECURITIES PRODUCTS ARE SUBJECT TO INVESTMENT RISKS, INCLUDING THE POSSIBLE LOSS OF PRINCIPAL.

DETAIL OF TRANSACTIONS

DATE	DESCRIPTION	PRINCIPAL CASH	INCOME CASH	COST	GAIN / LOSS
BEGINNING BALANCE		**0.00**	**0.00**	**1.00**	
RECEIPTS					
12/04/07	RECEIVED FOR FEE PAYMENT FROM BENSON ENVIROMENTAL, INC CHECK NUMBER 24571		1,000.00		
TOTAL RECEIPTS		**0.00**	**1,000.00**	**0.00**	**0.00**
DISBURSEMENTS					
12/04/07	FEE TO REGIONS BANK CHECK NUMBER 24571		1,000.00-		
TOTAL DISBURSEMENTS		**0.00**	**1,000.00-**	**0.00**	**0.00**
ENDING BALANCE		**0.00**	**0.00**	**1.00**	**0.00**

REGIONS MORGAN KEEGAN
TRUST

ACCOUNT STATEMENT

ACCOUNT NUMBER: **5011001993**

STATEMENT PERIOD: SEPTEMBER 01, 2007 THROUGH DECEMBER 31, 2007

REGIONS BANK
333 TEXAS STREET
SHREVEPORT, LA 71101

BENSON ENVIRONMENTAL SVCS TR INC
J. A. BENSON
P. O. BOX 239
SIBLEY, LA 71073

ACCOUNT NAME:	**REGIONS BANK BENSON ENVIRONMENTAL SERVICES TRUST OF LA, INC SOLID WASTE FACILITY TRUST**
ACCOUNT NUMBER:	**5011001993**
ADMINISTRATIVE OFFICER:	**CAROL D. RUSHTON 318-429-1815 Carol.Rushton@Regions.com**
INVESTMENT OFFICER:	**ROB BASHAM 318-429-1616 Rob.Basham@Regions.com**

ACTIVITY SUMMARY

	THIS PERIOD	YEAR TO DATE
BEGINNING MARKET VALUE	**1.00**	**1.00**
RECEIPTS	1,000.00	1,000.00
DISBURSEMENTS	1,000.00-	1,000.00-
ENDING MARKET VALUE	**1.00**	**1.00**

REALIZED CAPITAL GAINS / LOSSES

	THIS PERIOD	YEAR TO DATE
TOTAL GAINS / LOSSES	**0.00**	**0.00**

REGIONS MORGAN KEEGAN

TRUST

STATEMENT OF TRUSTEES FEES 1
INVOICE DATE 11/13/2007

5011001993 BENSON ENV SV TR

BENSON ENVIRONMENTAL SVCS TR INC
J. A. BENSON
P. O. BOX 239
SIBLEY LA 71073

INVOICE NUMBER 35151 $ 1,000.00

SUMMARY OF ACCOUNT

	PREVIOUS BALANCE	**0.00**
11/13/2007	CURRENT FEE	1,000.00
	BALANCE DUE	$ 1,000.00

FEE CALCULATION FOR 11/01/2006 THROUGH 10/31/2007

BASIS	ITEM	AMOUNT
	FLAT FEE	1,000.00
	TOTAL AMOUNT DUE FOR CURRENT PERIOD	$ 1,000.00

* FEES ARE DUE WITHIN 90 DAYS OF THE INVOICE DATE. *
* ANY FEE NOT PAID WILL BE CHARGED TO THE TRUST. *

IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT
CAROL D. RUSHTON AT 318-429-1815